

NOTES

1. Transducer data are based on compensated values. Drawdown data based on water head above transducer data.
2. ft = feet

**HALEY
ALDRICH**

FLORENCE COPPER
FLORENCE, ARIZONA

TRACER TEST HYDROGRAPHS

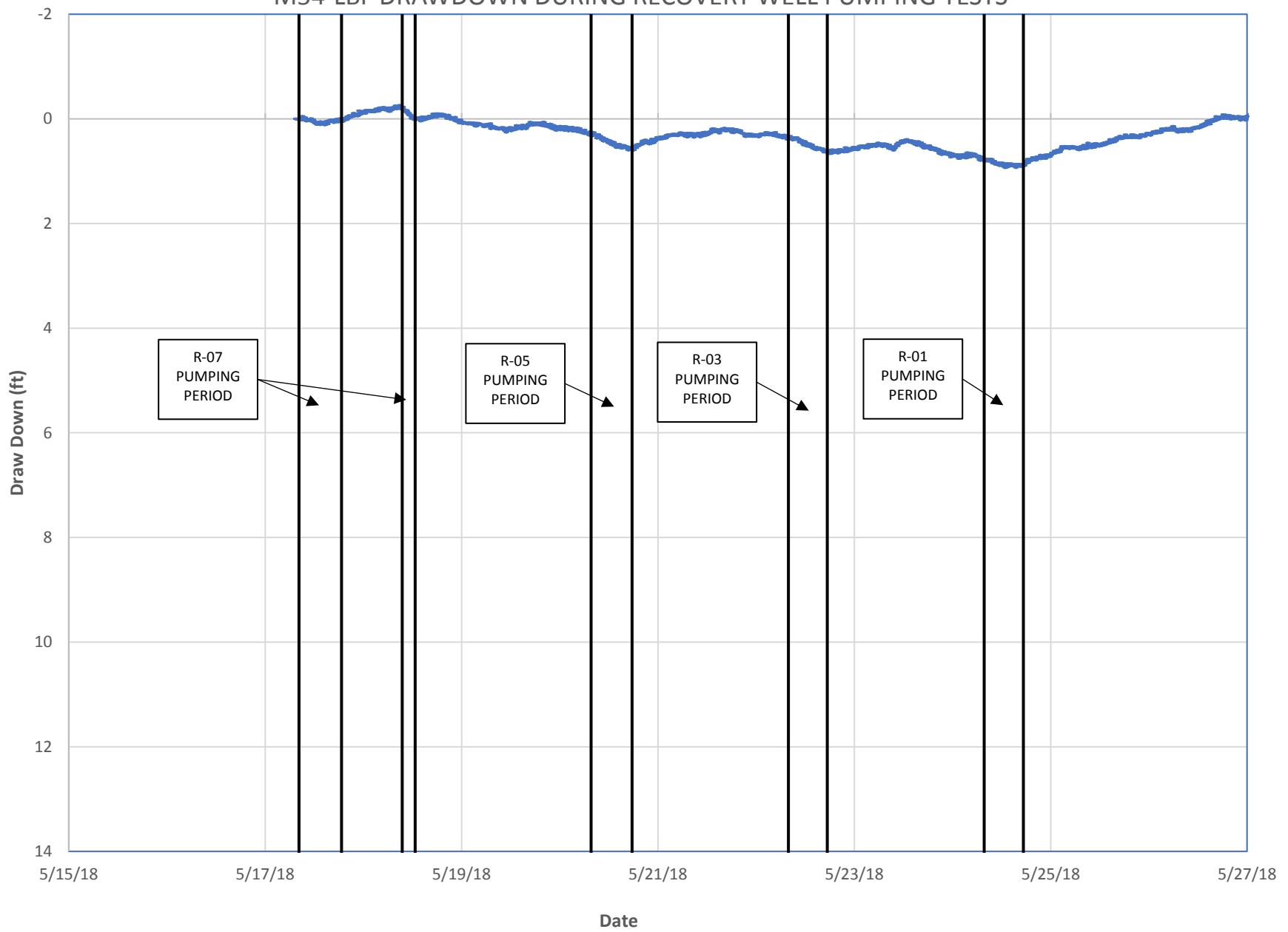
JULY 2018

FIGURE 17

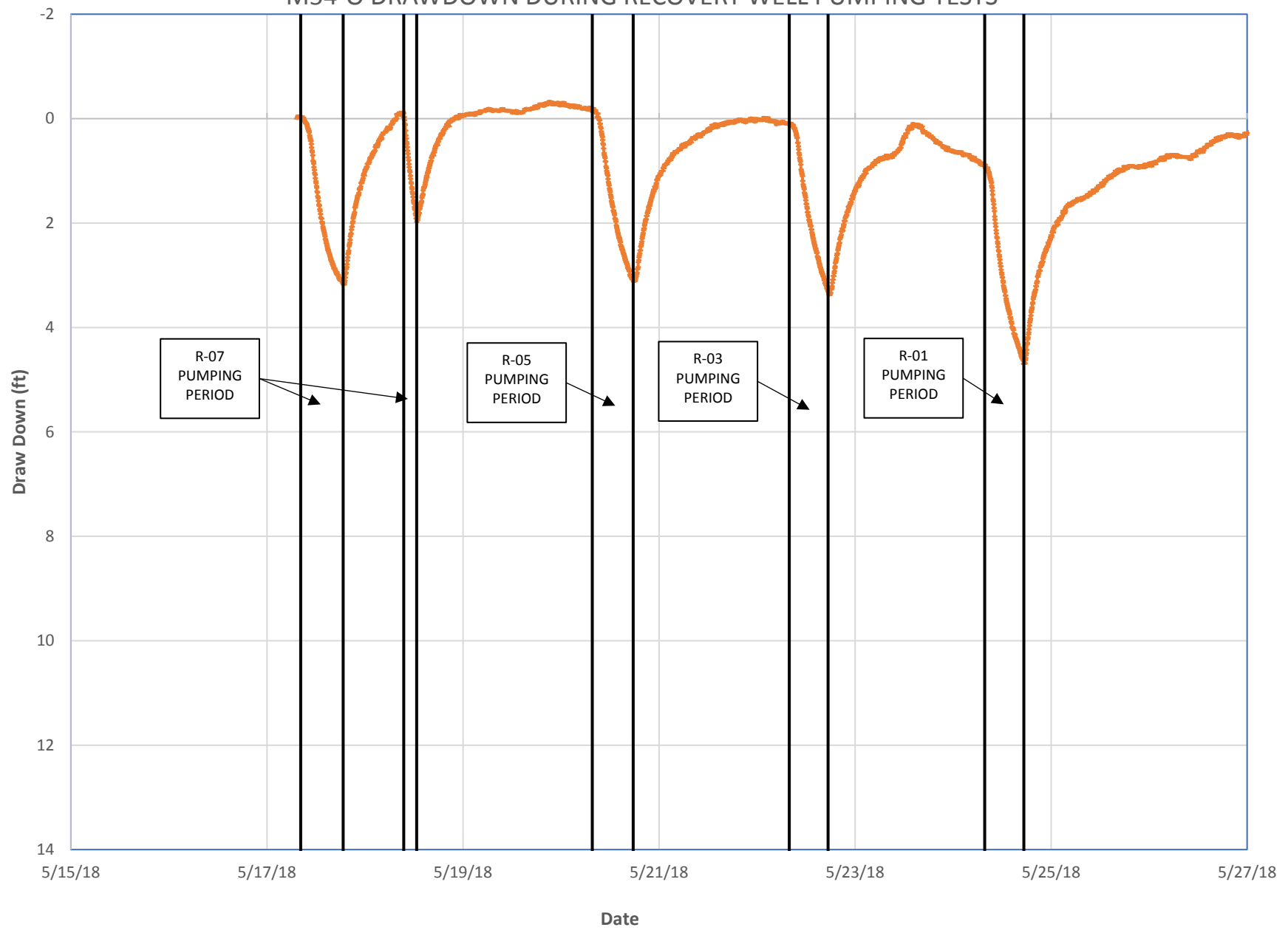
APPENDIX A

Monitoring Well Hydrographs

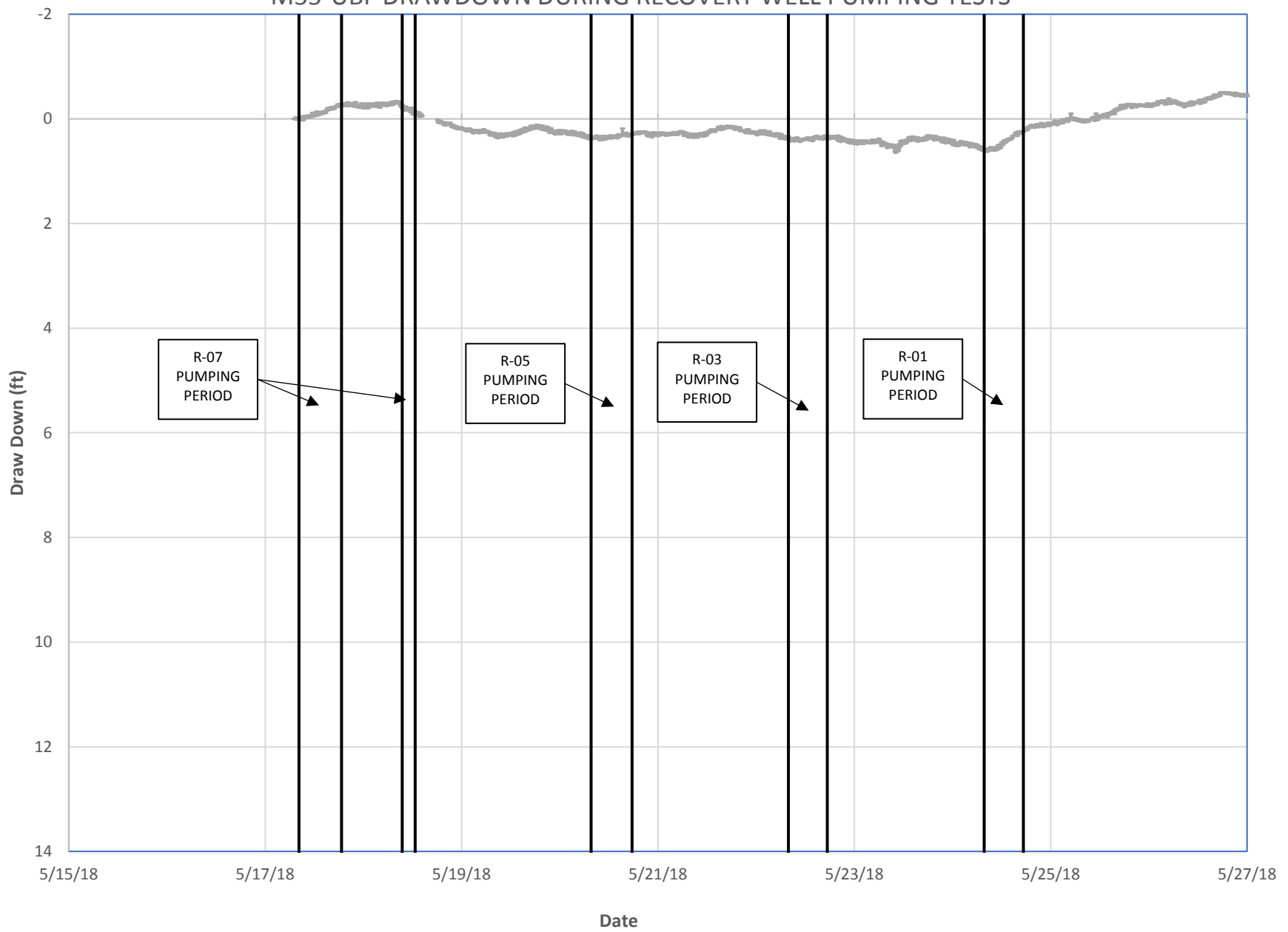
M54-LBF DRAWDOWN DURING RECOVERY WELL PUMPING TESTS



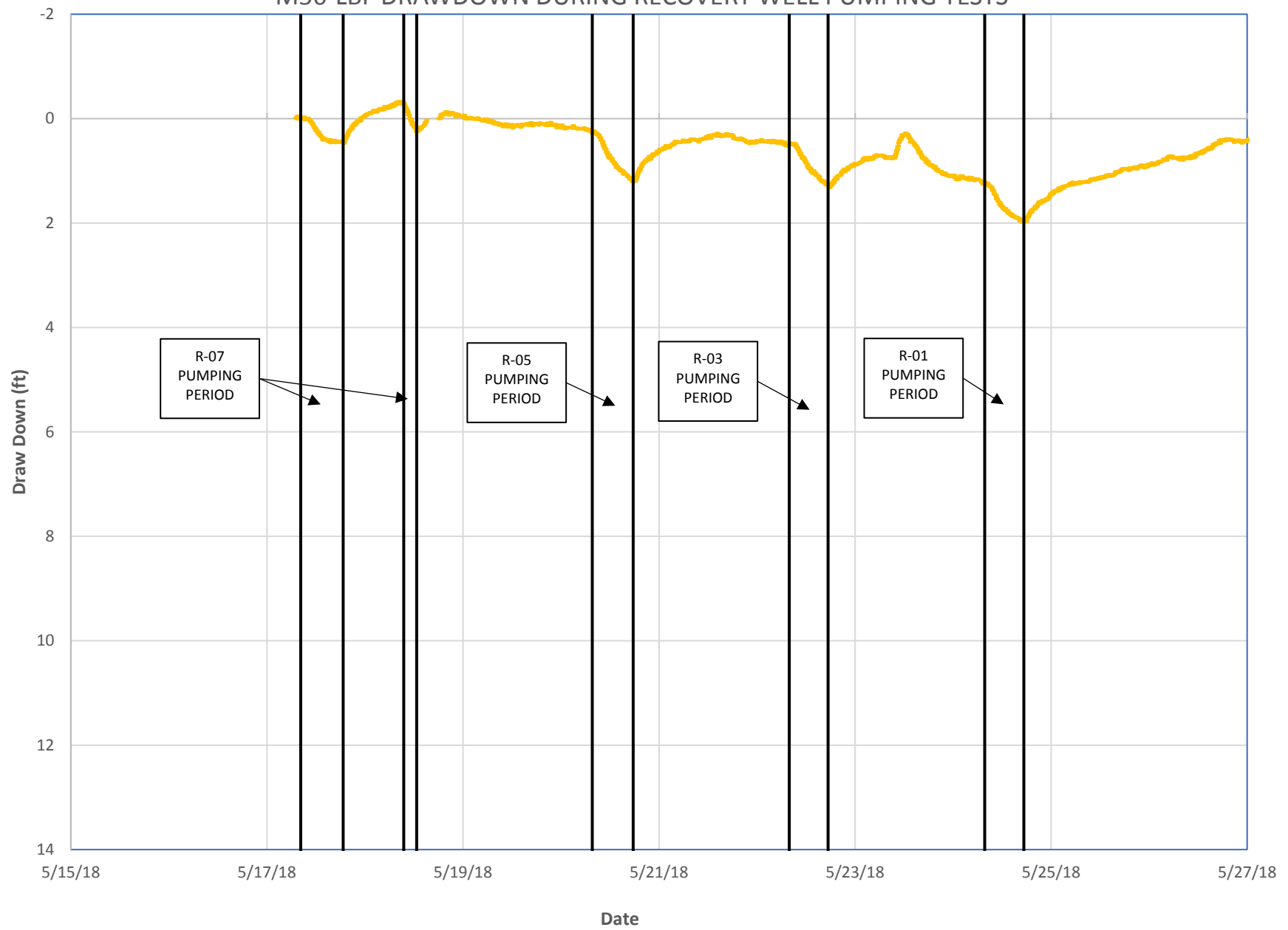
M54-O DRAWDOWN DURING RECOVERY WELL PUMPING TESTS



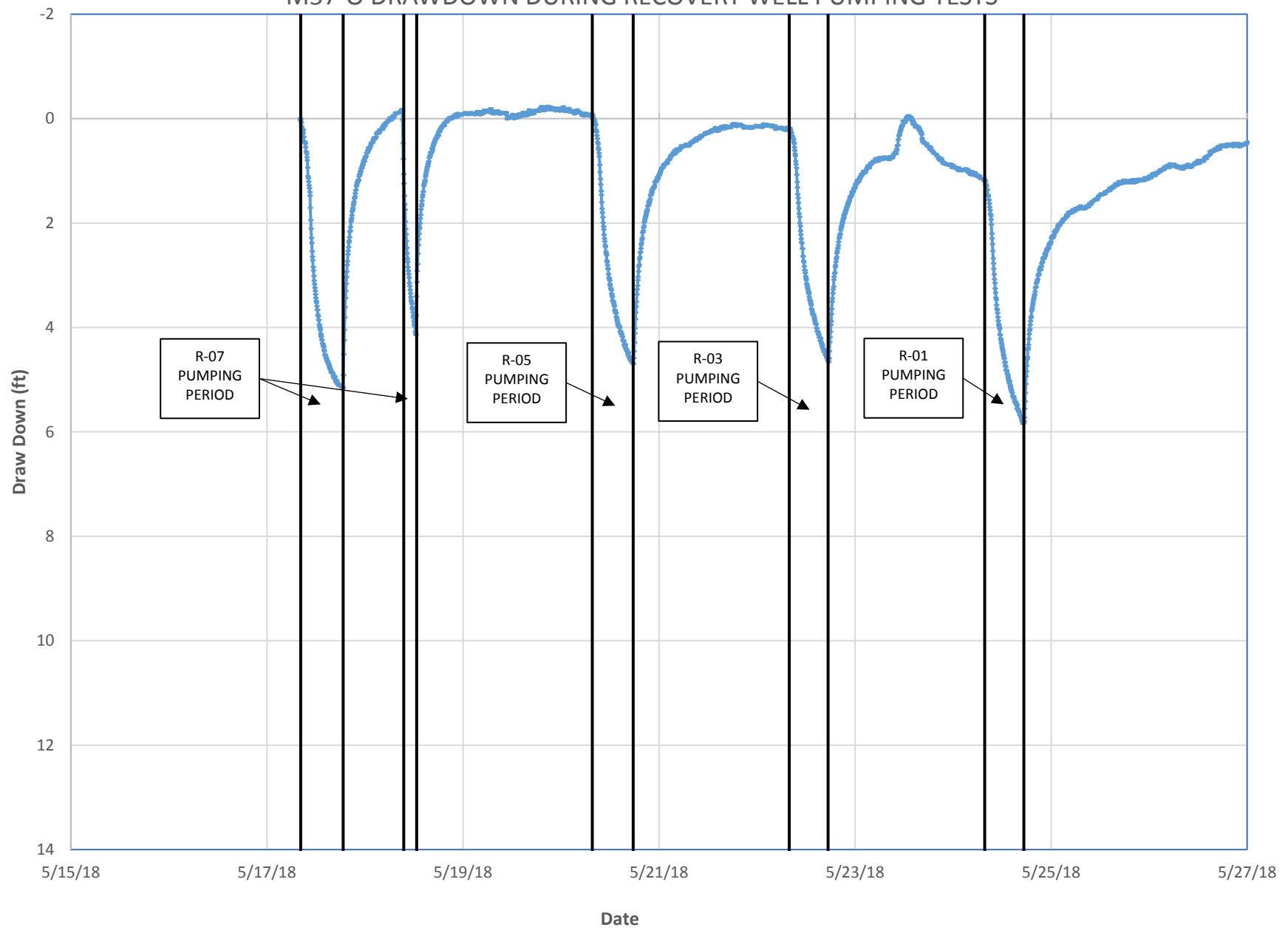
M55-UBF DRAWDOWN DURING RECOVERY WELL PUMPING TESTS



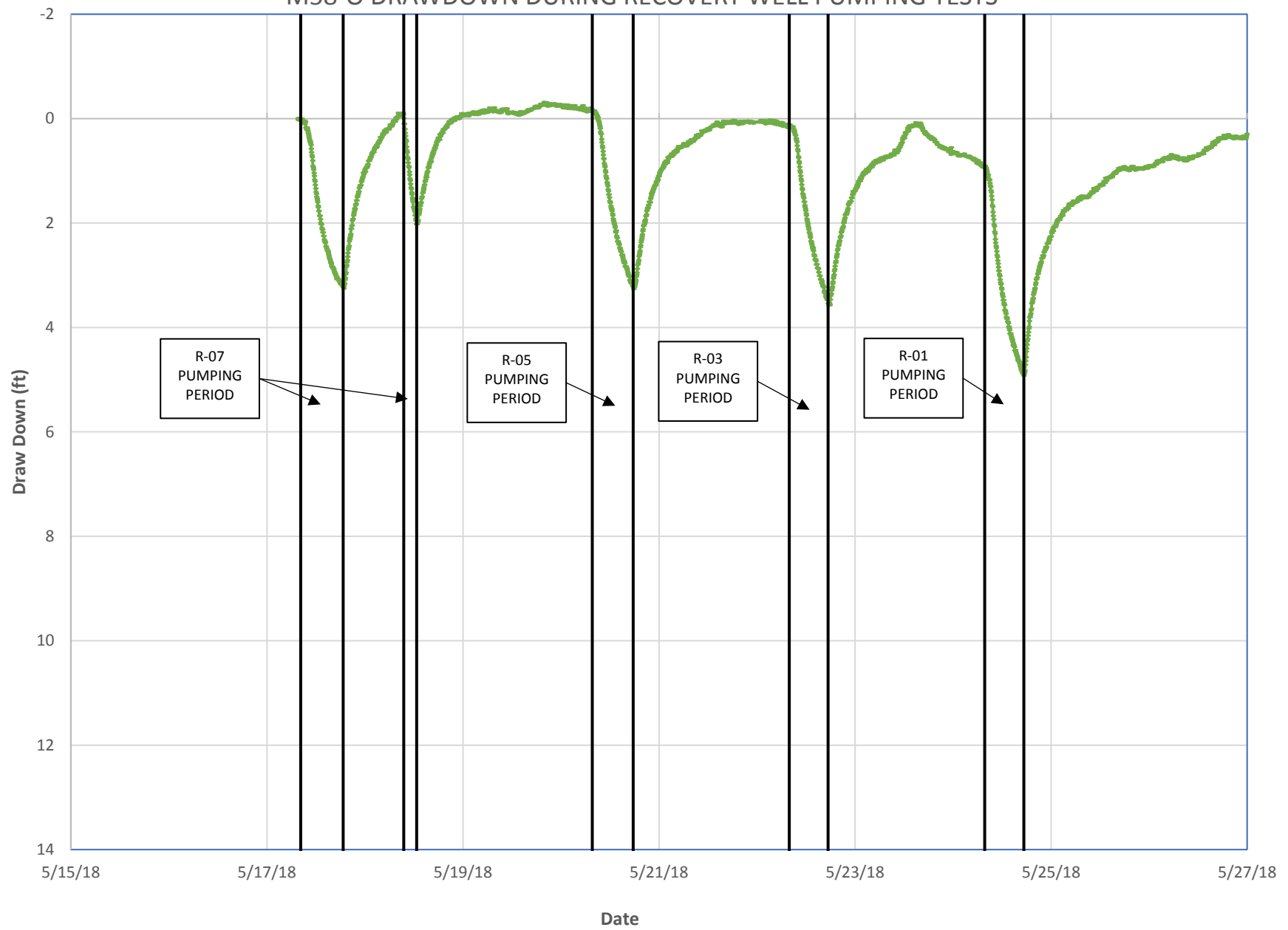
M56-LBF DRAWDOWN DURING RECOVERY WELL PUMPING TESTS



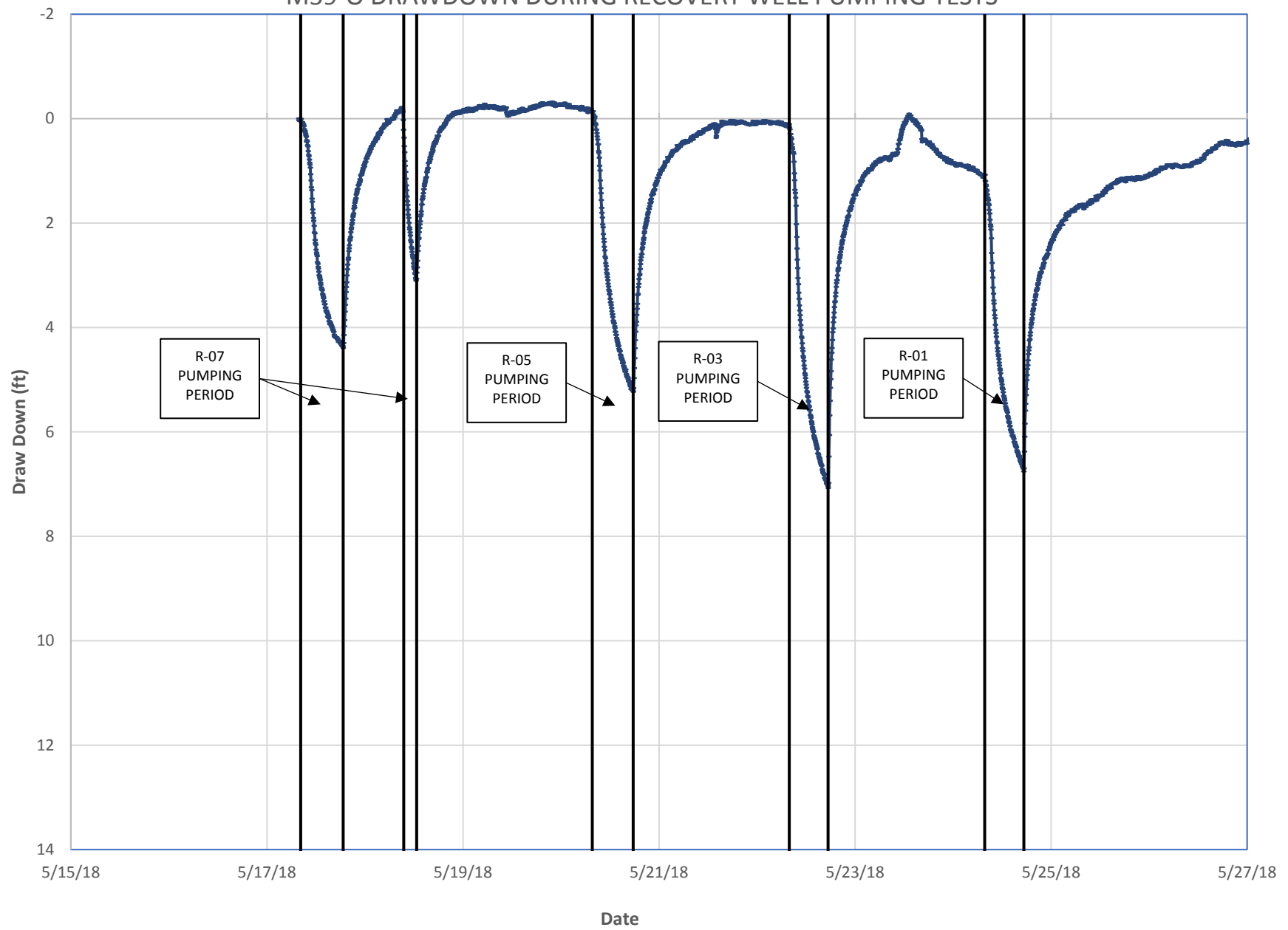
M57-O DRAWDOWN DURING RECOVERY WELL PUMPING TESTS



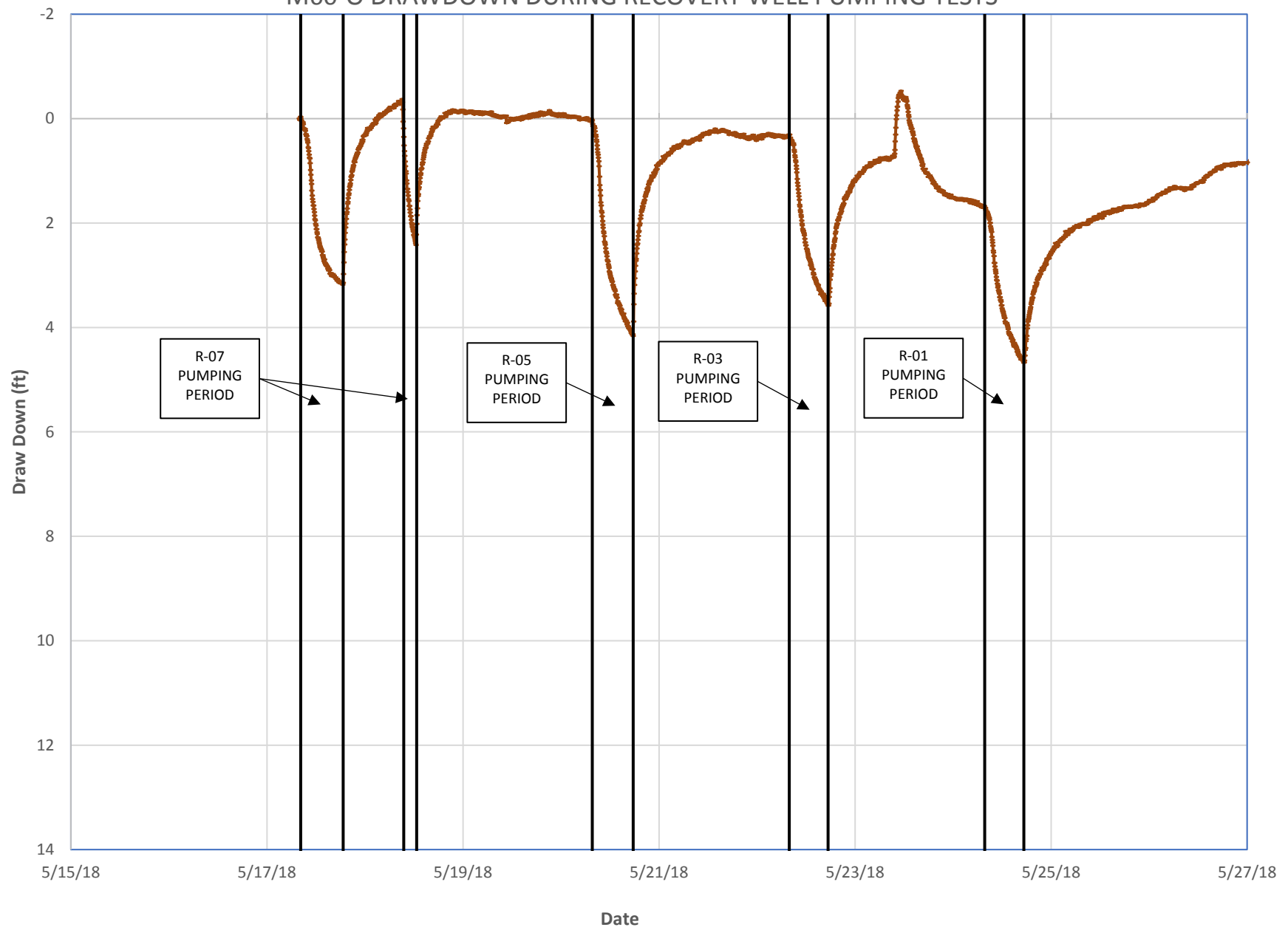
M58-O DRAWDOWN DURING RECOVERY WELL PUMPING TESTS



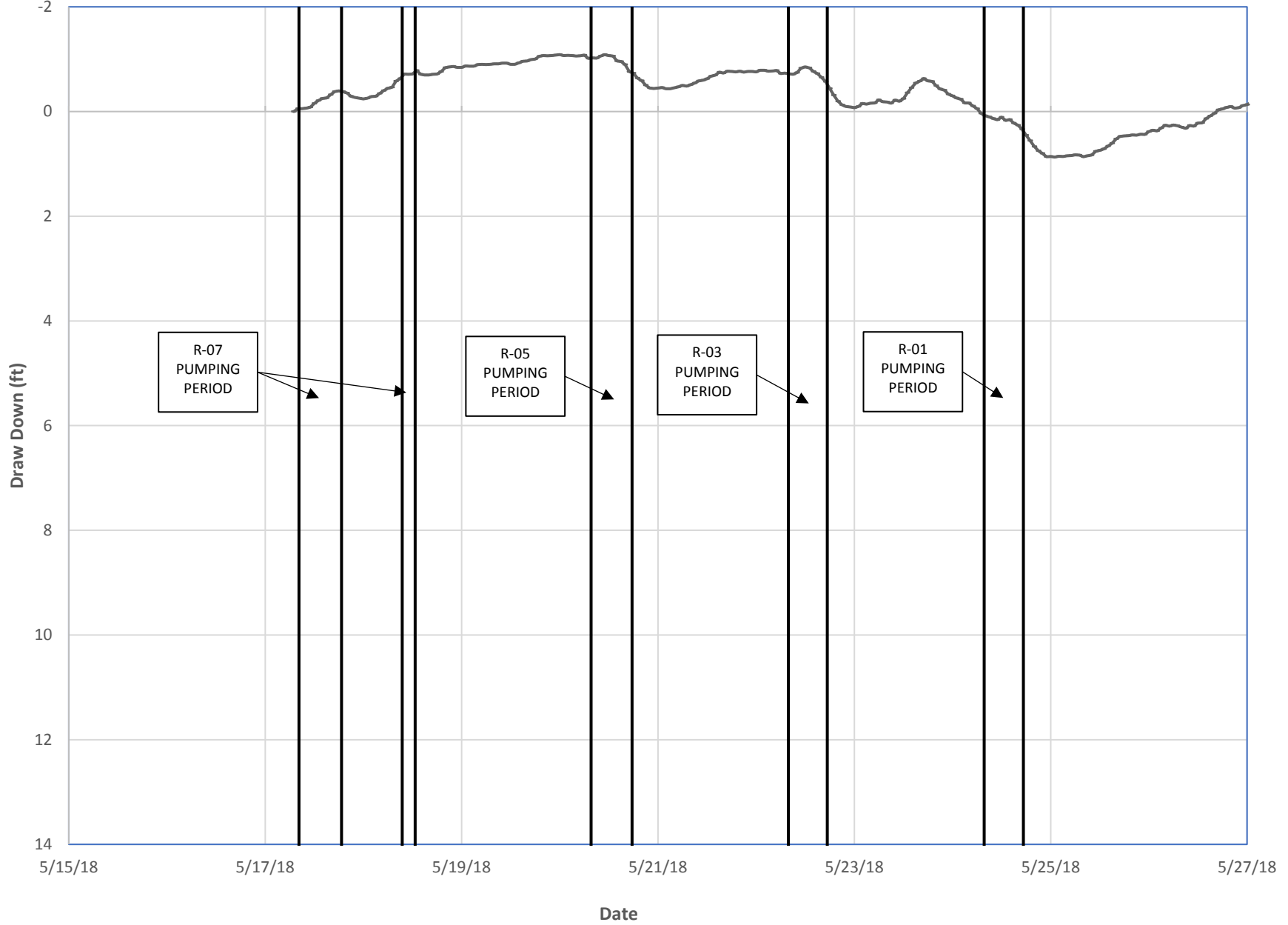
M59-O DRAWDOWN DURING RECOVERY WELL PUMPING TESTS



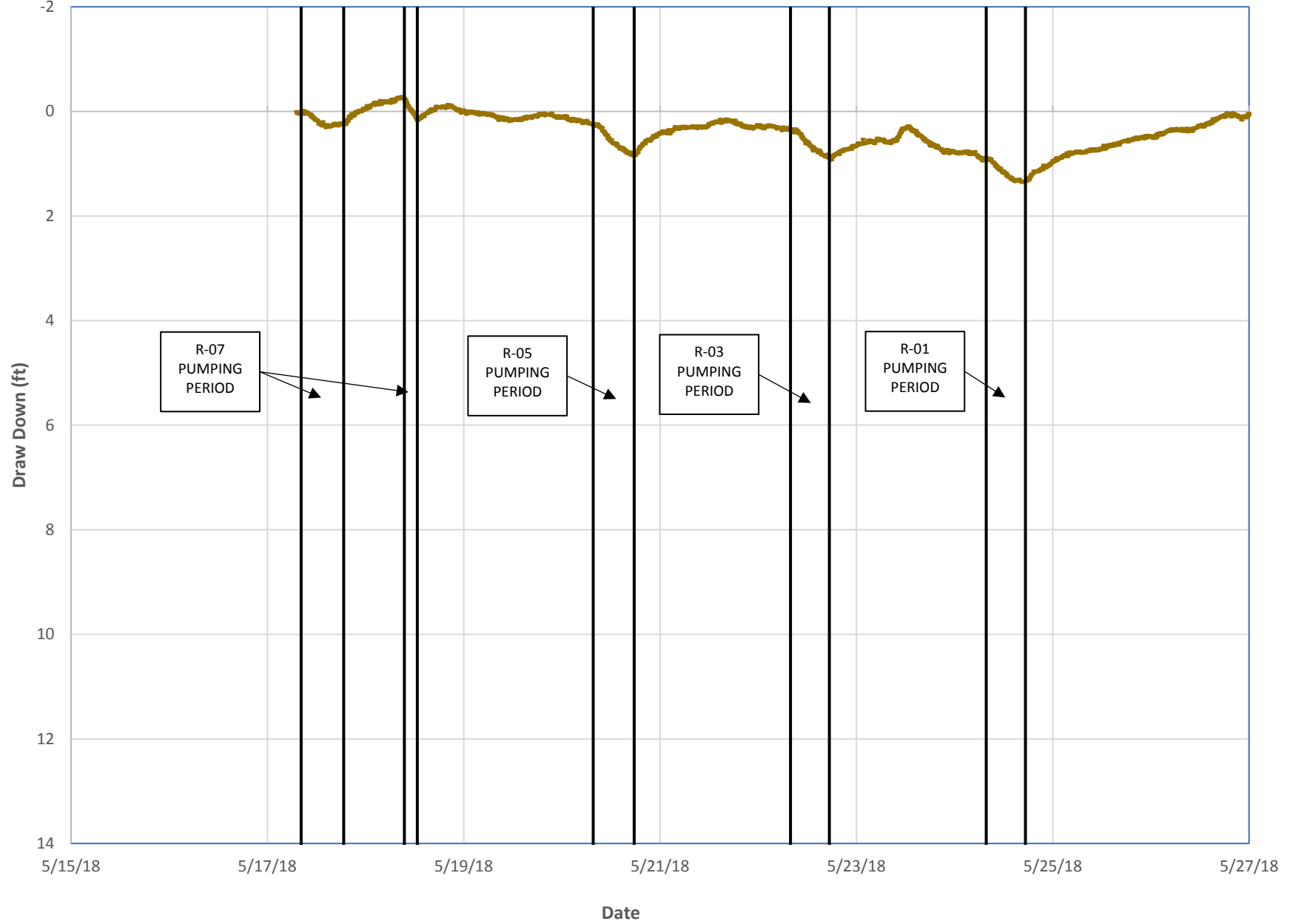
M60-O DRAWDOWN DURING RECOVERY WELL PUMPING TESTS



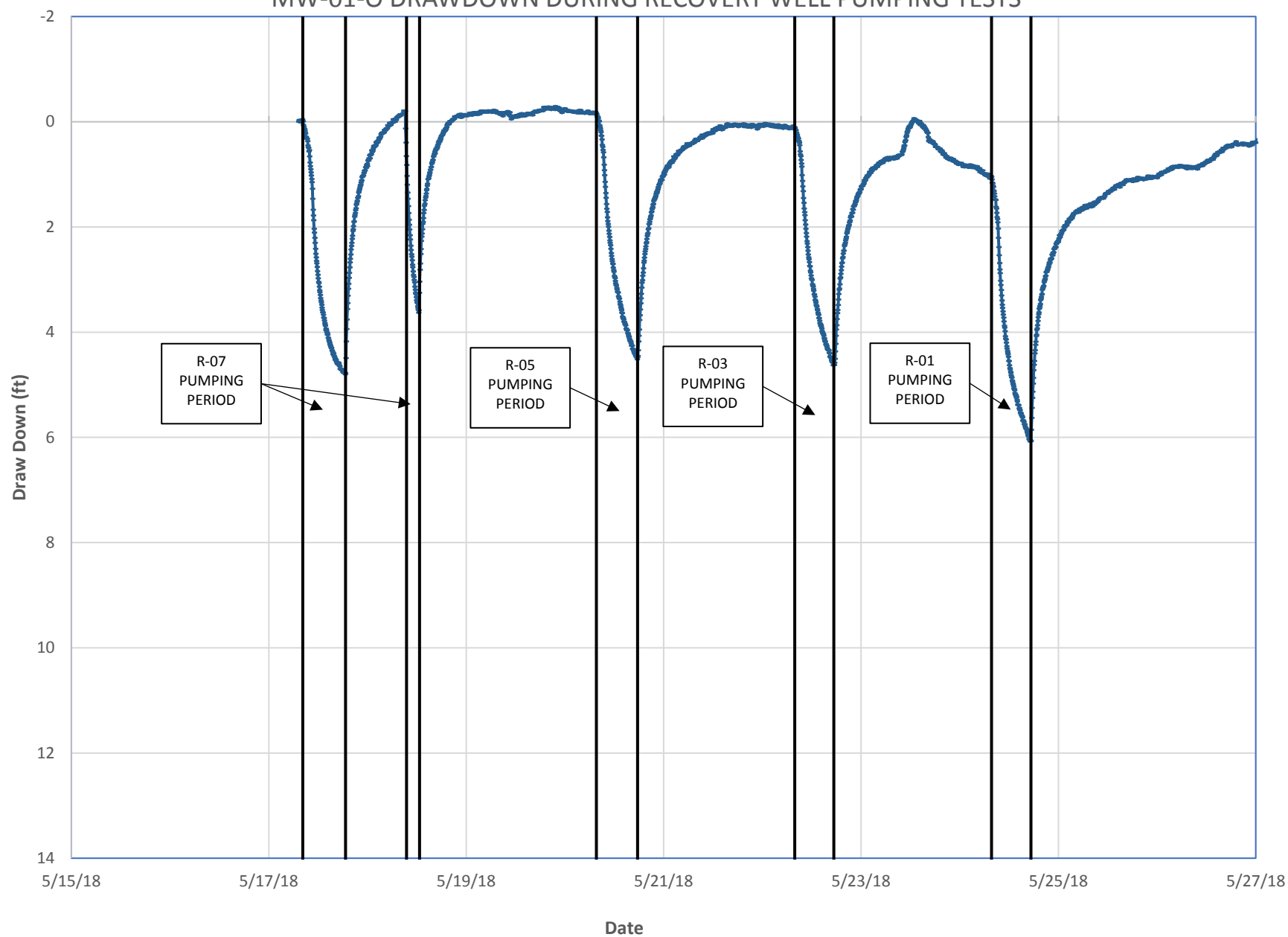
M61-LBF DRAWDOWN DURING RECOVERY WELL PUMPING TESTS



MW-01-LBF DRAWDOWN DURING RECOVERY WELL PUMPING TESTS



MW-01-O DRAWDOWN DURING RECOVERY WELL PUMPING TESTS



APPENDIX B

Spinner Flow Profiling Raw Data



Southwest Exploration Services, LLC

borehole geophysics & video services

COMPANY FLORENCE COPPER									
WELL ID R-01									
FIELD FLORENCE COPPER									
COUNTY PINAL STATE ARIZONA									
TYPE OF LOGS: DYNAMIC SPINNER									
OTHER SERVICES NONE									
MORE:									
LOCATION									
SEC TWP RGE									
PERMANENT DATUM ELEVATION									
LOG MEAS. FROM GROUND LEVEL ABOVE PERM. DATUM									
DRILLING MEAS. FROM GROUND LEVEL G.L.									
DATE 5-24-18 TYPE FLUID IN HOLE FORMATION WATER									
RUN No 1 MUD WEIGHT N/A									
TYPE LOG DYNAMIC SPINNER VISCOSITY N/A									
DEPTH-DRILLER 1200 FT. LEVEL N/A									
DEPTH-LOGGER 1190 FT. MAX. REC. TEMP. N/A									
BTM LOGGED INTERVAL 1180 FT. IMAGE ORIENTED TO: N/A									
TOP LOGGED INTERVAL 480 FT. SAMPLE INTERVAL 0.2 FT.									
DRILLER / RIG# HYDRO RESOURCES LOGGING TRUCK TRUCK #200									
RECORDED BY / Logging Eng. A. OLSON TOOL STRING/SN MSI SFM SPINNER SN 5726									
WITNESSED BY COLLIN - H&A LOG TIME:ON SITE/OFF SITE 9:30 A.M.									
RUN BOREHOLE RECORD CASING RECORD									
NO. BIT FROM TO SIZE WGT. FROM TO									
1 ? SURFACE 40 FT. 14 IN. STEEL SURFACE 500 FT.									
2 20 IN. 40 FT 506 FT. 5 IN. FG SURFACE 500 FT.									
3 12 1/4 IN. 506 FT. TOTAL DEPTH 5 IN. PVC 500 FT. TOTAL DEPTH									
COMMENTS:									

Tool Summary:

Date	5-24-18	Date		Date	
Run No.	1	Run No.	2	Run No.	3
Tool Model	MSI SFM SPINNER	Tool Model		Tool Model	
Tool SN	5726	Tool SN		Tool SN	
From	480 FT.	From		From	
To	1180 FT.	To		To	
Recorded By	A. OLSON	Recorded By		Recorded By	
Truck No	200	Truck No		Truck No	
Operation Check	5-14-18	Operation Check		Operation Check	
Calibration Check	5-14-18	Calibration Check		Calibration Check	
Time Logged	11:00 A.M.	Time Logged		Time Logged	

Date		Date		Date	
Run No.	4	Run No.	5	Run No.	6
Tool Model		Tool Model		Tool Model	
Tool SN		Tool SN		Tool SN	
From		From		From	
To		To		To	
Recorded By		Recorded By		Recorded By	
Truck No		Truck No		Truck No	
Operation Check		Operation Check		Operation Check	
Calibration Check		Calibration Check		Calibration Check	
Time Logged		Time Logged		Time Logged	

Additional Comments:

Caliper Arms Used: N/A

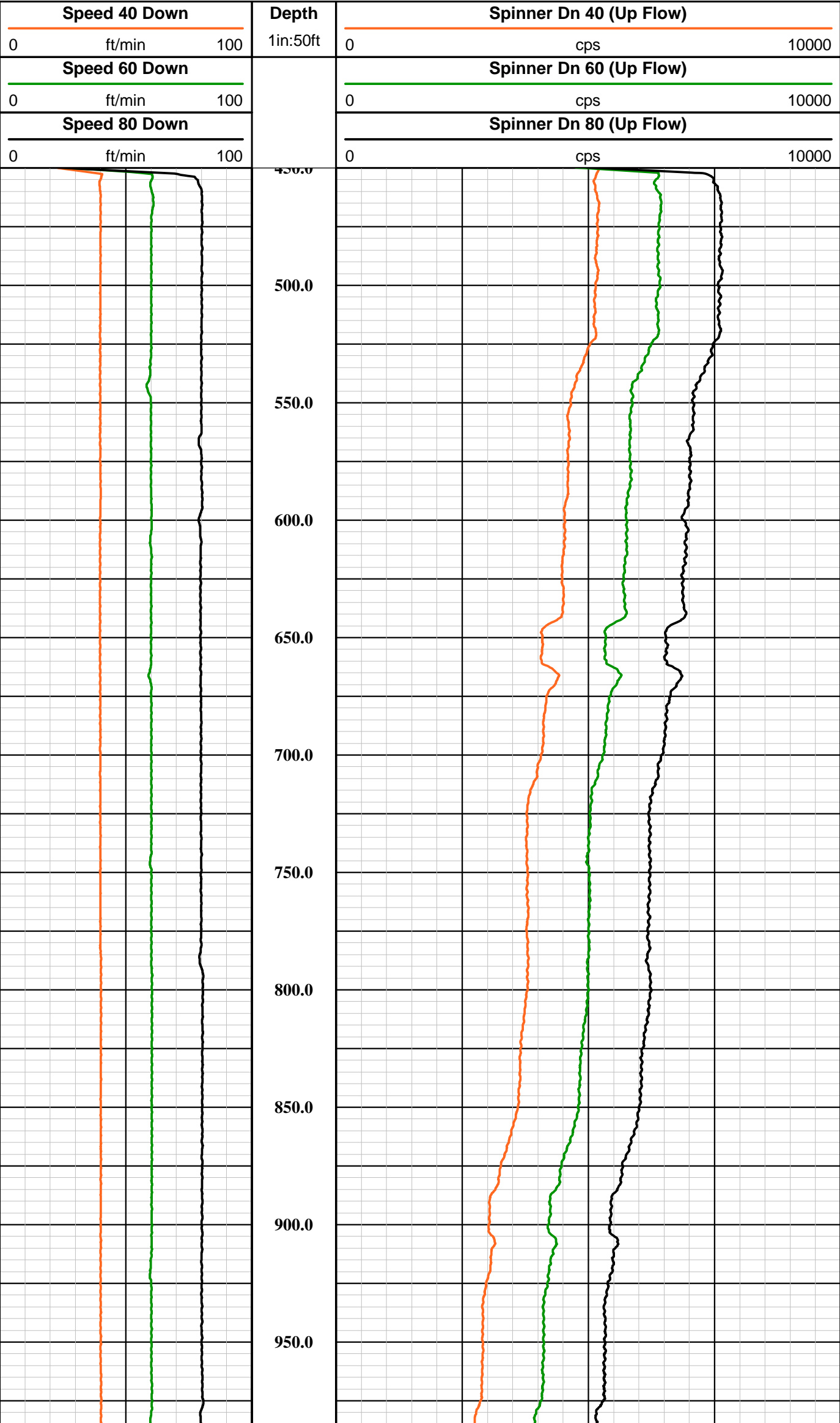
Calibration Points: N/A

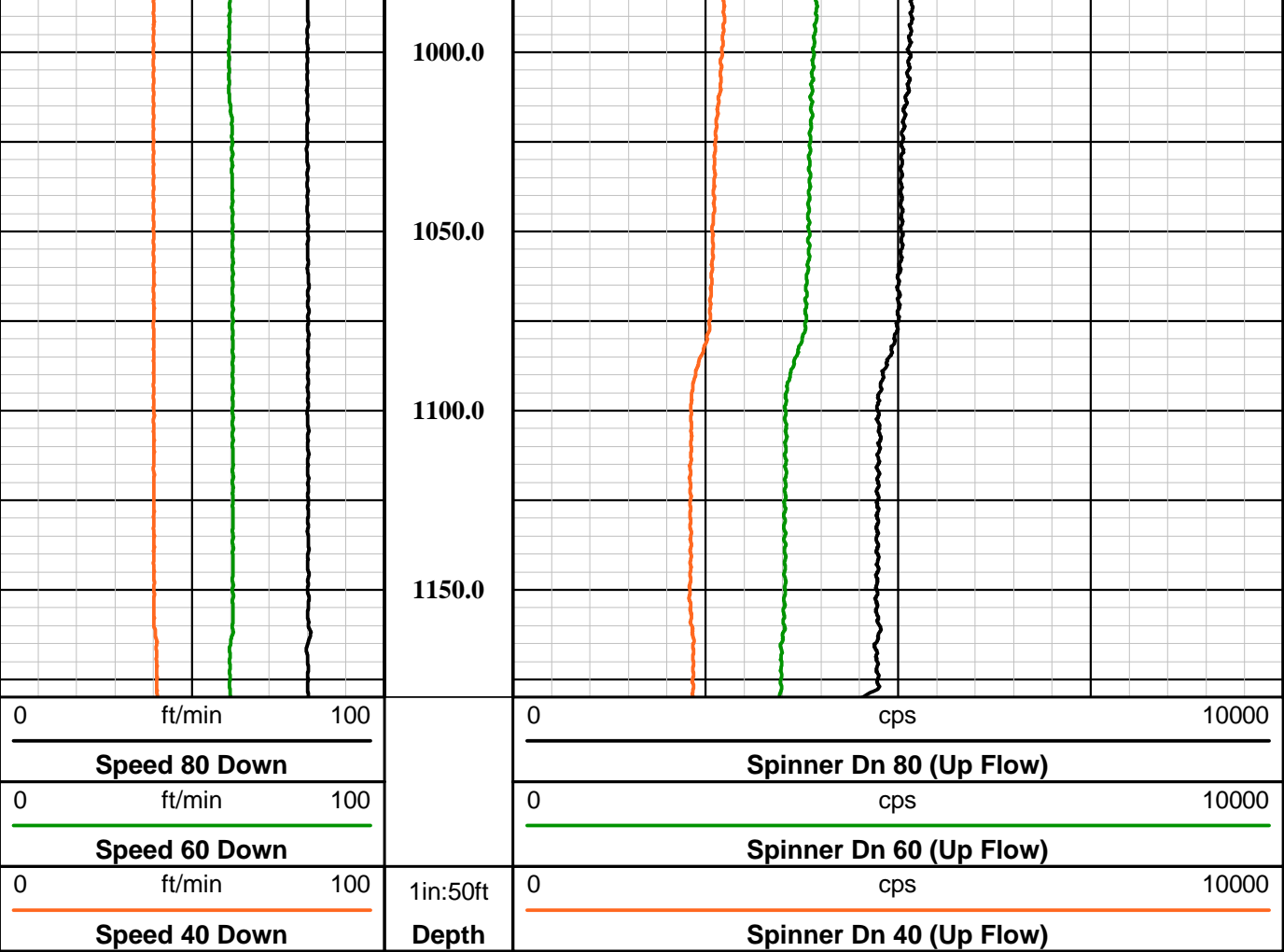
E-Log Calibration Range: N/A

Calibration Points: N/A

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MSI QL-40 Spinner Flowmeter (SFM) SN 5726

Probe Top = Depth Ref.



Single Conductor MSI Probe Top

Probe Length = 0.90 m or 2.95 ft
Probe Weight = 3.25 kg or 7.2 lbs

Operating Temperature: 80 Deg C (176 Deg F)

Presure Rating: 200 bar (2900 psi)

Two impeller cage sizes: 3" and 4"

Tool is run centralized. Depending on well diamter, a weight bar may be added to the assembly.

Can be used in static wells or under pumping conditions.

Measures both upflow and downflow.

Minimum Flow Rate: 3-5 gpm
Maximum Flow Rate: 5000 gpm



1.57" or 40 mm Diameter (Cage dependent)



**Southwest Exploration
Services, LLC**
borehole geophysics & video services

Company	FLORENCE COPPER
Well	R-01
Field	FLORENCE COPPER
County	PINAL
State	ARIZONA

Preliminary

Dynamic Spinner Summary



Southwest Exploration Services, LLC
borehole geophysics & video services

COMPANY FLORENCE COPPER									
WELL ID R-03									
FIELD FLORENCE COPPER									
COUNTY PINAL STATE ARIZONA									
TYPE OF LOGS: DYNAMIC SPINNER									
MORE:									
LOCATION									
OTHER SERVICES NONE									
PERMANENT DATUM		SEC		TWP		RGE		ELEVATION	
LOG MEAS. FROM		GROUND LEVEL		ABOVE PERM. DATUM		D.F.		K.B.	
DRILLING MEAS. FROM		GROUND LEVEL		G.L.					
DATE		5-22-18		TYPE FLUID IN HOLE		FORMATION WATER			
RUN No		1		MUD WEIGHT		N/A			
TYPE LOG		DYNAMIC SPINNER		VISCOSITY		N/A			
DEPTH-DRILLER		1200 FT.		LEVEL		N/A			
DEPTH-LOGGER		1190 FT.		MAX. REC. TEMP.		N/A			
BTM LOGGED INTERVAL		1180 FT.		IMAGE ORIENTED TO:		N/A			
TOP LOGGED INTERVAL		480 FT.		SAMPLE INTERVAL		0.2 FT.			
DRILLER / RIG#		HYDRO RESOURCES		LOGGING TRUCK		TRUCK #200			
RECORDED BY / Logging Eng.		A. OLSON		TOOL STRING/SN		MSI SFM SPINNER SN 5726			
WITNESSED BY		COLLIN - H&A		LOG TIME:ON SITE/OFF SITE		9:30 A.M.			
RUN BOREHOLE RECORD									
CASING RECORD									
NO.		BIT		FROM		TO		SIZE	
1		?		SURFACE		40 FT.		14 IN.	
2		20 IN.		40 FT		506 FT.		5 IN.	
3		12 1/4 IN.		506 FT.		TOTAL DEPTH		5 IN.	
COMMENTS:									

Tool Summary:

Date	5-22-18	Date		Date	
Run No.	1	Run No.	2	Run No.	3
Tool Model	MSI SFM SPINNER	Tool Model		Tool Model	
Tool SN	5726	Tool SN		Tool SN	
From	480 FT.	From		From	
To	1180 FT.	To		To	
Recorded By	A. OLSON	Recorded By		Recorded By	
Truck No	200	Truck No		Truck No	
Operation Check	5-14-18	Operation Check		Operation Check	
Calibration Check	5-14-18	Calibration Check		Calibration Check	
Time Logged	11:00 A.M.	Time Logged		Time Logged	

Date		Date		Date	
Run No.	4	Run No.	5	Run No.	6
Tool Model		Tool Model		Tool Model	
Tool SN		Tool SN		Tool SN	
From		From		From	
To		To		To	
Recorded By		Recorded By		Recorded By	
Truck No		Truck No		Truck No	
Operation Check		Operation Check		Operation Check	
Calibration Check		Calibration Check		Calibration Check	
Time Logged		Time Logged		Time Logged	

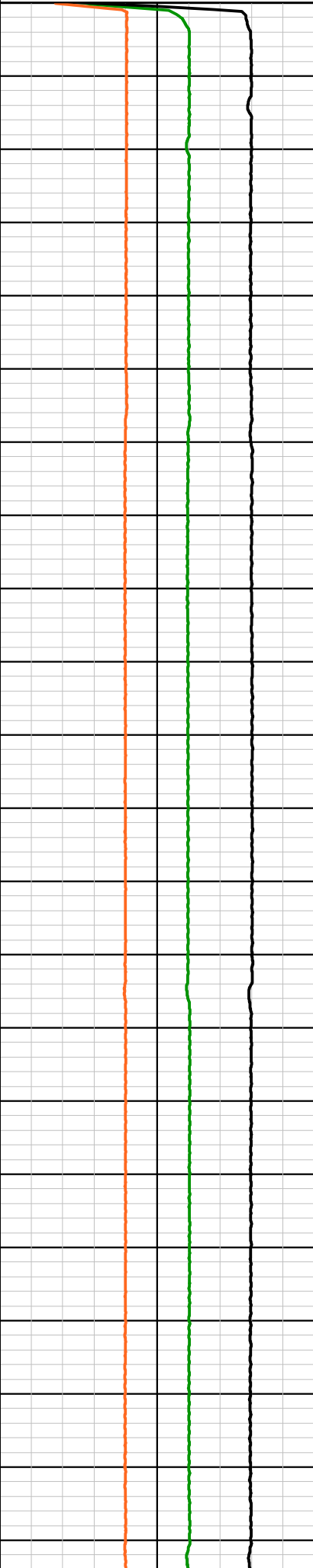
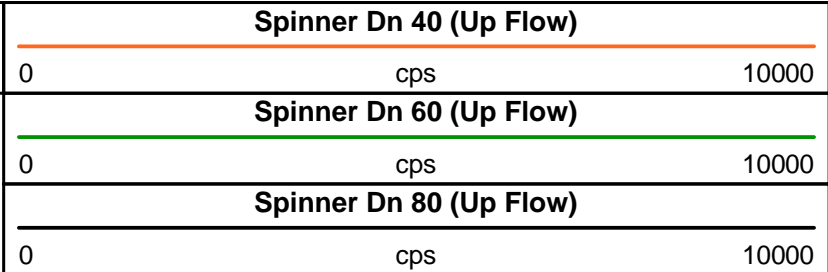
Additional Comments:
Caliper Arms Used: N/A
E-Log Calibration Range: N/A
Calibration Points: N/A
Calibration Points: N/A

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Depth
1in:50ft



450.0

500.0

550.0

600.0

650.0

700.0

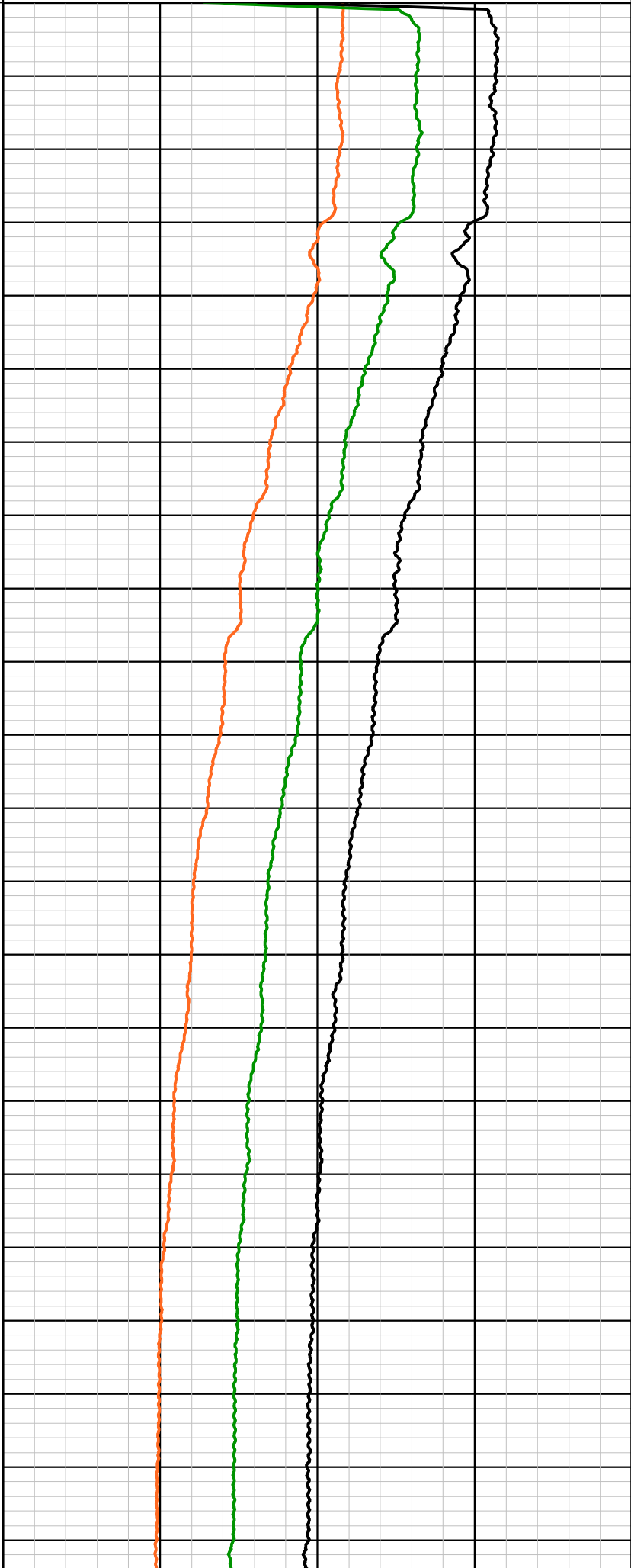
750.0

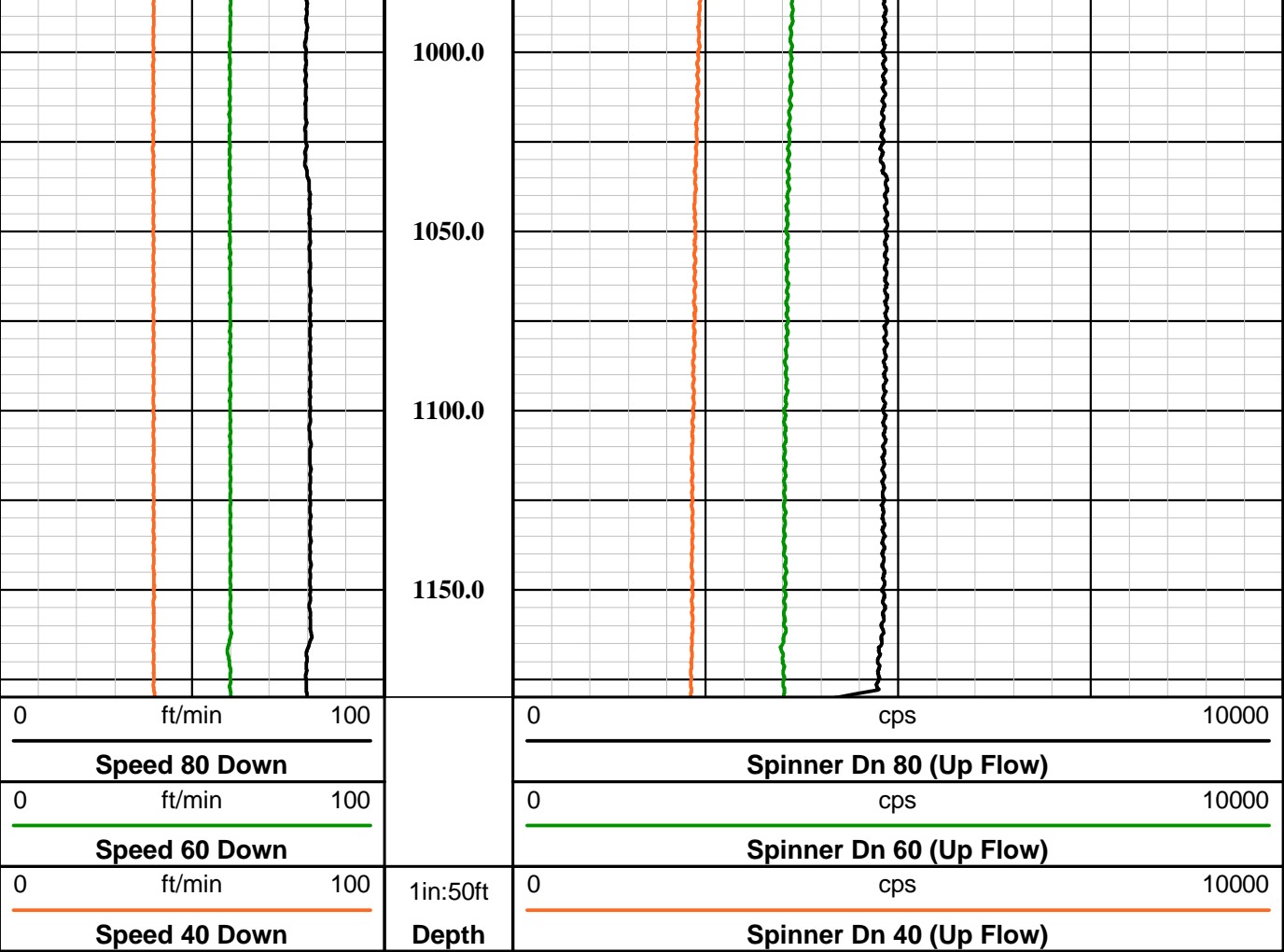
800.0

850.0

900.0

950.0





MSI QL-40 Spinner Flowmeter (SFM) SN 5726

Probe Top = Depth Ref.



Single Conductor MSI Probe Top

Probe Length = 0.90 m or 2.95 ft
Probe Weight = 3.25 kg or 7.2 lbs

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1.57" or 40 mm Diameter (Cage dependent)



Southwest Exploration Services, LLC
borehole geophysics & video services

Company	FLORENCE COPPER
Well	R-03
Field	FLORENCE COPPER
County	PINAL
State	ARIZONA

Preliminary

Dynamic Spinner Summary



Southwest Exploration Services, LLC

borehole geophysics & video services

COMPANY FLORENCE COPPER									
WELL ID R-05									
FIELD FLORENCE COPPER									
COUNTY PINAL STATE ARIZONA									
TYPE OF LOGS: DYNAMIC SPINNER									
OTHER SERVICES									
NONE									
MORE:									
LOCATION									
SEC TWP RGE									
PERMANENT DATUM									
ELEVATION									
K.B.									
LOG MEAS. FROM GROUND LEVEL ABOVE PERM. DATUM D.F.									
DRILLING MEAS. FROM GROUND LEVEL G.L.									
DATE 5-20-18 TYPE FLUID IN HOLE FORMATION WATER									
RUN No 1 MUD WEIGHT N/A									
TYPE LOG DYNAMIC SPINNER VISCOSITY N/A									
DEPTH-DRILLER 1200 FT. LEVEL N/A									
DEPTH-LOGGER 1190 FT. MAX. REC. TEMP. N/A									
BTM LOGGED INTERVAL 1180 FT. IMAGE ORIENTED TO: N/A									
TOP LOGGED INTERVAL 480 FT. SAMPLE INTERVAL 0.2 FT.									
DRILLER / RIG# HYDRO RESOURCES LOGGING TRUCK TRUCK #200									
RECORDED BY / Logging Eng. A. OLSON TOOL STRING/SN MSI SFM SPINNER SN 5726									
WITNESSED BY COLLIN - H&A LOG TIME:ON SITE/OFF SITE 9:30 A.M.									
RUN BOREHOLE RECORD CASING RECORD									
NO. BIT FROM TO SIZE WGT. FROM TO									
1 ? SURFACE 40 FT. 14 IN. STEEL SURFACE 500 FT.									
2 20 IN. 40 FT 506 FT. 5 IN. FG SURFACE 500 FT.									
3 12 1/4 IN. 506 FT. TOTAL DEPTH 5 IN. PVC 500 FT. TOTAL DEPTH									
COMMENTS:									

Tool Summary:

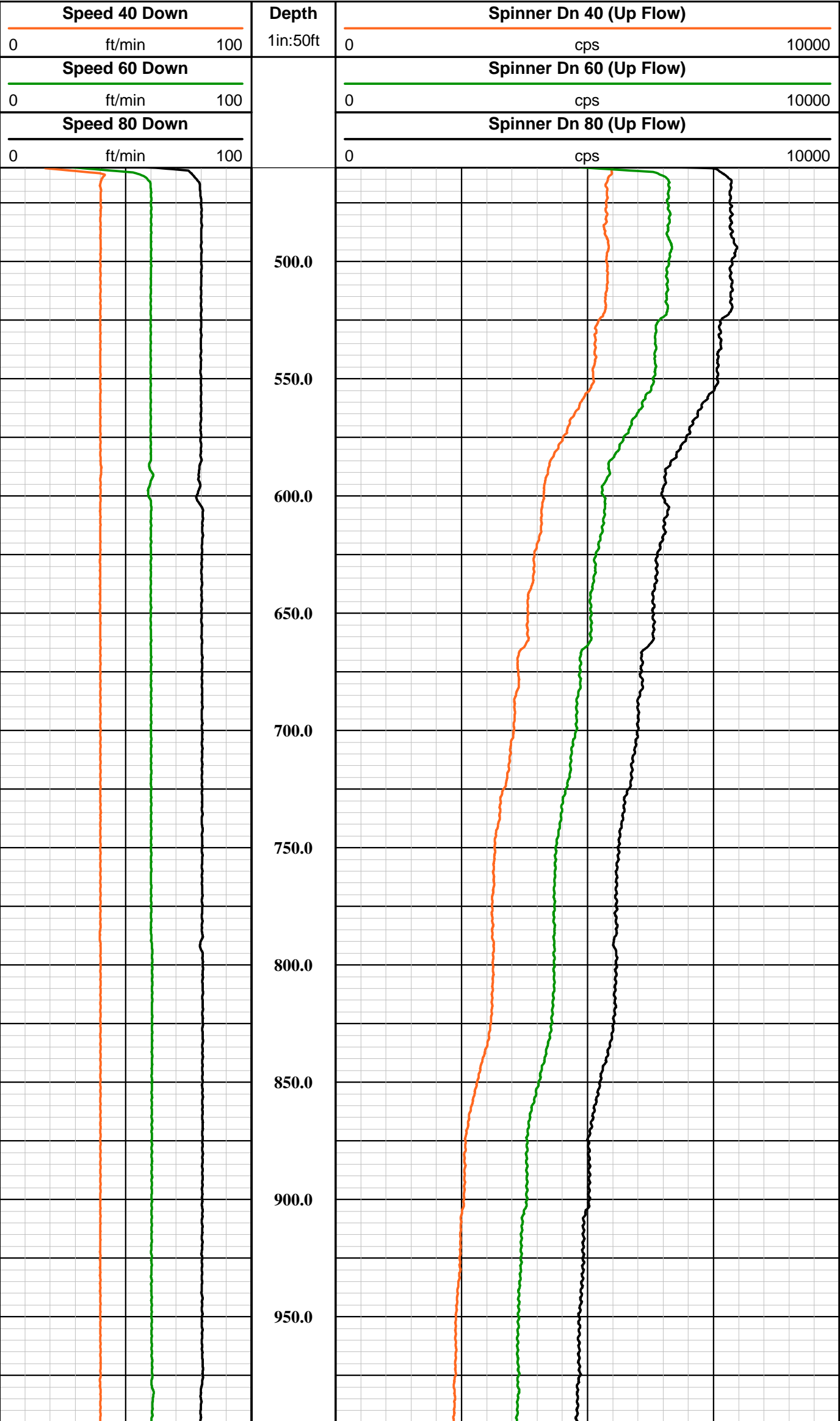
Date	5-20-18	Date		Date	
Run No.	1	Run No.	2	Run No.	3
Tool Model	MSI SFM SPINNER	Tool Model		Tool Model	
Tool SN	5726	Tool SN		Tool SN	
From	480 FT.	From		From	
To	1180 FT.	To		To	
Recorded By	A. OLSON	Recorded By		Recorded By	
Truck No	200	Truck No		Truck No	
Operation Check	5-14-18	Operation Check		Operation Check	
Calibration Check	5-14-18	Calibration Check		Calibration Check	
Time Logged	11:00 A.M.	Time Logged		Time Logged	

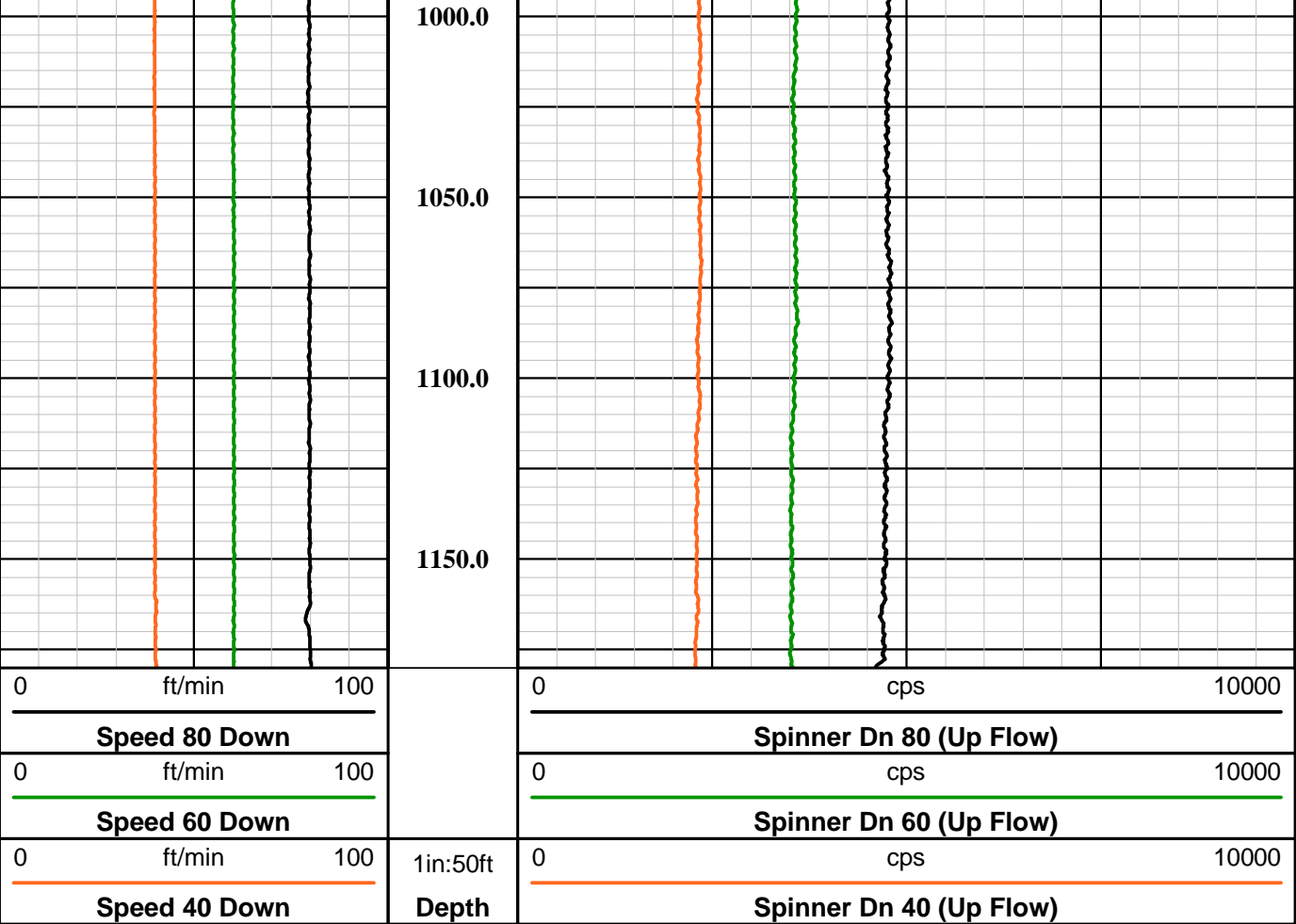
Date		Date		Date	
Run No.	4	Run No.	5	Run No.	6
Tool Model		Tool Model		Tool Model	
Tool SN		Tool SN		Tool SN	
From		From		From	
To		To		To	
Recorded By		Recorded By		Recorded By	
Truck No		Truck No		Truck No	
Operation Check		Operation Check		Operation Check	
Calibration Check		Calibration Check		Calibration Check	
Time Logged		Time Logged		Time Logged	

Additional Comments:
Caliper Arms Used: N/A
E-Log Calibration Range: N/A
Calibration Points: N/A
Calibration Points: N/A

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1.57" or 40 mm Diameter (Cage dependent)

<div><div><div><div>Southwest Exploration Services, LLC</div><div>borehole geophysics & video services</div></div></div></div> <div><div>Company</div><div>FLORENCE COPPER</div><div>Well</div><div>R-05</div><div>Field</div><div>FLORENCE COPPER</div><div>County</div><div>PINAL</div><div>State</div><div>ARIZONA</div></div>	
Preliminary	Dynamic Spinner Summary



**Southwest Exploration
Services, LLC**
borehole geophysics & video services

COMPANY FLORENCE COPPER									
WELL ID R-07									
FIELD FLORENCE COPPER									
COUNTY PINAL STATE ARIZONA									
TYPE OF LOGS: DYNAMIC SPINNER							OTHER SERVICES		
MORE:							NONE		
LOCATION									
PERMANENT DATUM		SEC		TWP		RGE		K.B.	
LOG MEAS. FROM		GROUND LEVEL		ABOVE PERM. DATUM		D.F.			
DRILLING MEAS. FROM		GROUND LEVEL				G.L.			
DATE		5-18-18		TYPE FLUID IN HOLE		MUD			
RUN No		1		MUD WEIGHT		N/A			
TYPE LOG		DYNAMIC SPINNER		VISCOSITY		N/A			
DEPTH-DRILLER		1200 FT.		LEVEL		N/A			
DEPTH-LOGGER		1193 FT.		MAX. REC. TEMP.		N/A			
BTM LOGGED INTERVAL		1180 FT.		IMAGE ORIENTED TO:		N/A			
TOP LOGGED INTERVAL		480 FT.		SAMPLE INTERVAL		0.2 FT.			
DRILLER / RIG#		HYDRO RESOURCES		LOGGING TRUCK		TRUCK #200			
RECORDED BY / Logging Eng.		A. OLSON		TOOL STRING/SN		MSI SFM SPINNER SN 5726			
WITNESSED BY		COLLIN - H&A		LOG TIME:ON SITE/OFF SITE		7:00 A.M.			
RUN BOREHOLE RECORD									
NO.		BIT		FROM		TO		SIZE	
1		?		SURFACE		40 FT.		14 IN.	
2		20 IN.		40 FT		506 FT.		5 IN.	
3		12 1/4 IN.		506 FT.		TOTAL DEPTH		5 IN.	
COMMENTS:									

Tool Summary:

Date	5-18-18	Date		Date	
Run No.	1	Run No.	2	Run No.	3
Tool Model	MSI SFM SPINNER	Tool Model		Tool Model	
Tool SN	5726	Tool SN		Tool SN	
From	480 FT.	From		From	
To	1180 FT.	To		To	
Recorded By	A. OLSON	Recorded By		Recorded By	
Truck No	200	Truck No		Truck No	
Operation Check	5-14-18	Operation Check		Operation Check	
Calibration Check	5-14-18	Calibration Check		Calibration Check	
Time Logged	10:30 A.M.	Time Logged		Time Logged	

Date		Date		Date	
Run No.	4	Run No.	5	Run No.	6
Tool Model		Tool Model		Tool Model	
Tool SN		Tool SN		Tool SN	
From		From		From	
To		To		To	
Recorded By		Recorded By		Recorded By	
Truck No		Truck No		Truck No	
Operation Check		Operation Check		Operation Check	
Calibration Check		Calibration Check		Calibration Check	
Time Logged		Time Logged		Time Logged	

Additional Comments:

Caliper Arms Used: N/A

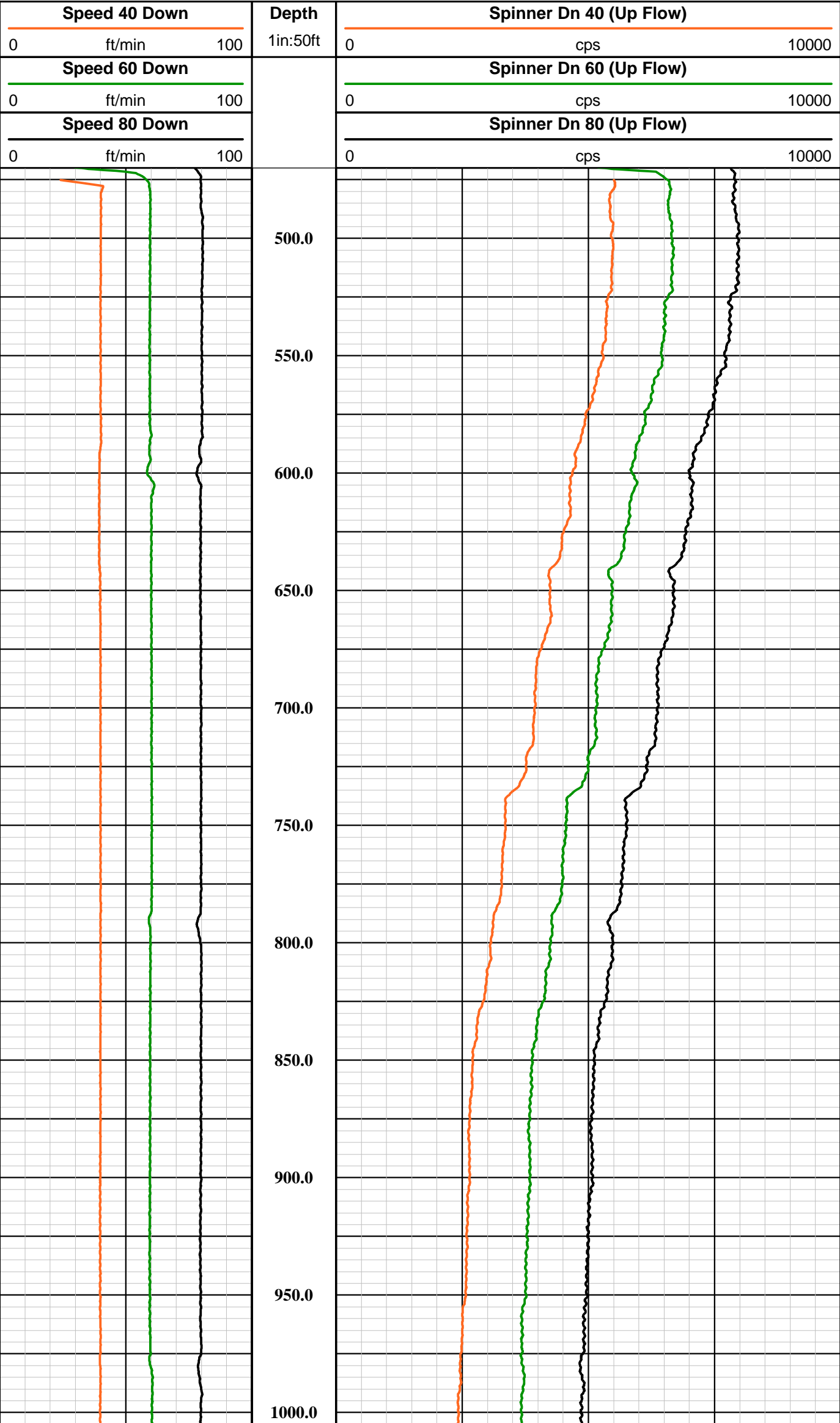
Calibration Points: N/A

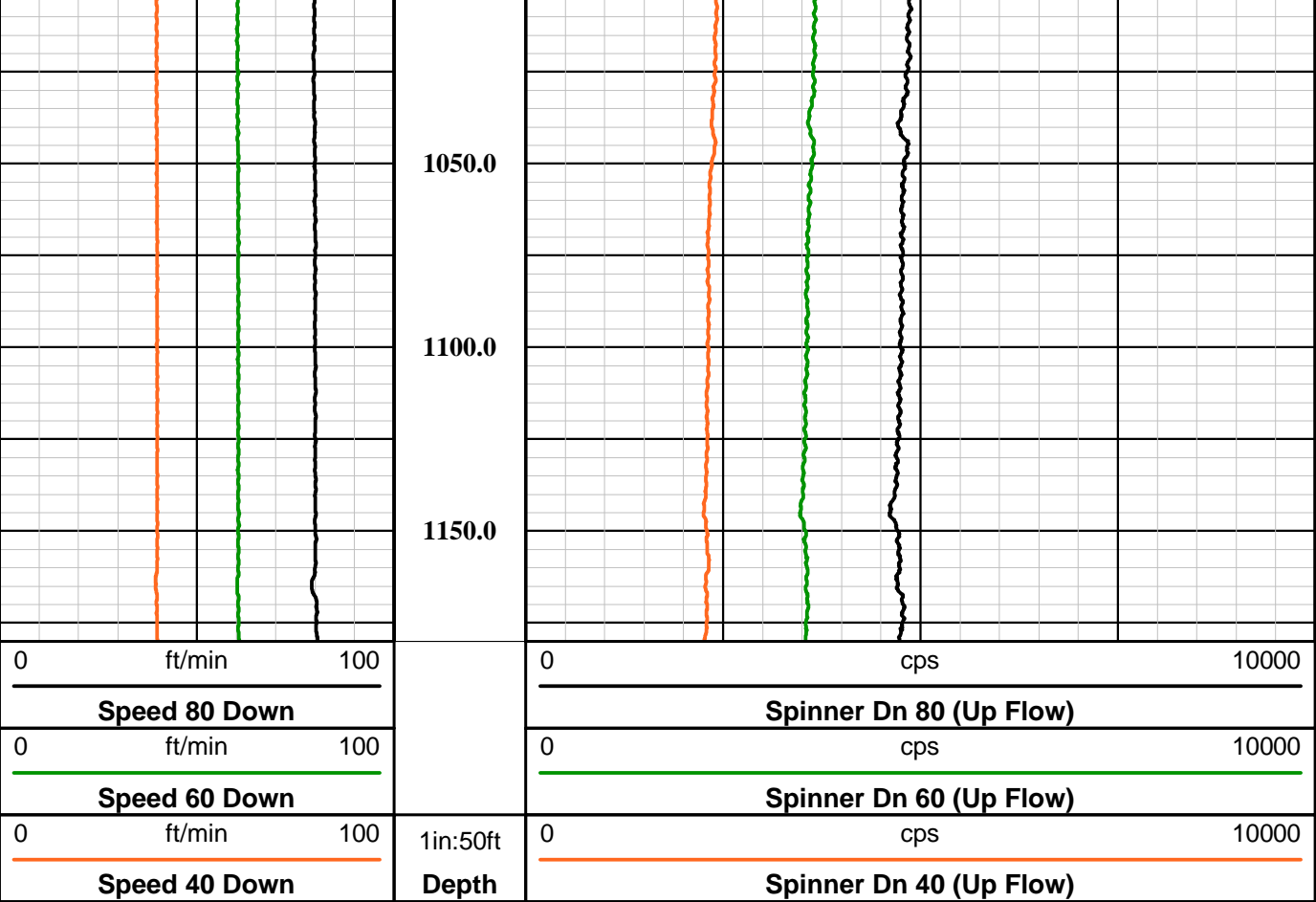
E-Log Calibration Range: N/A

Calibration Points: N/A

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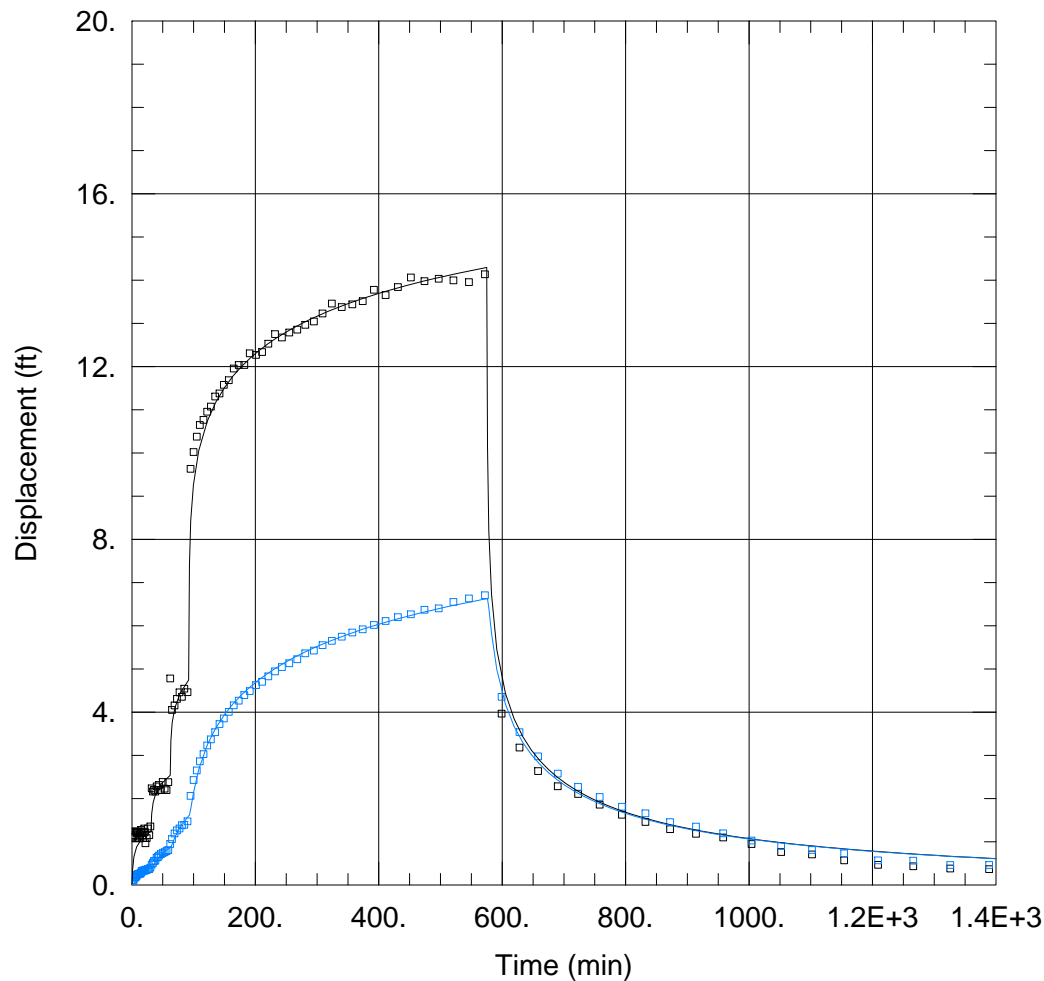
Minimum Flow Rate: 3-5 gpm
Maximum Flow Rate: 5000 gpm

1.57" or 40 mm Diameter (Cage dependent)

<div><div></div><div><div>Southwest Exploration Services, LLC</div><div>borehole geophysics & video services</div></div></div>	
Company	FLORENCE COPPER
Well	R-07
Field	FLORENCE COPPER
County	PINAL
State	ARIZONA
<div><div>Preliminary</div><div>Dynamic Spinner Summary</div></div>	

APPENDIX C

AQTESOLV Results



WELL TEST ANALYSIS

Data Set: C:\...\R-01_O-01_draft.aqt

Date: 07/23/18

Time: 04:15:36

AQUIFER DATA

Saturated Thickness: 841. ft

Aquitard Thickness (b'): 1. ft

Anisotropy Ratio (Kz/Kr): 1.

Aquitard Thickness (b''): 1. ft

WELL DATA

Pumping Wells

Well Name	X (ft)	Y (ft)
R-01	847692.93	746271.15

Observation Wells

Well Name	X (ft)	Y (ft)
□ R-01	847692.93	746271.15
□ O-01	847692.93	746200.45

SOLUTION

Aquifer Model: Leaky

$T = 406.5 \text{ ft}^2/\text{day}$

$1/B = 0.0007515 \text{ ft}^{-1}$

$C = 0.1318 \text{ min}^2/\text{ft}^5$

Solution Method: Hantush-Jacob

$S = 0.0009847$

$S_w = -3.648$

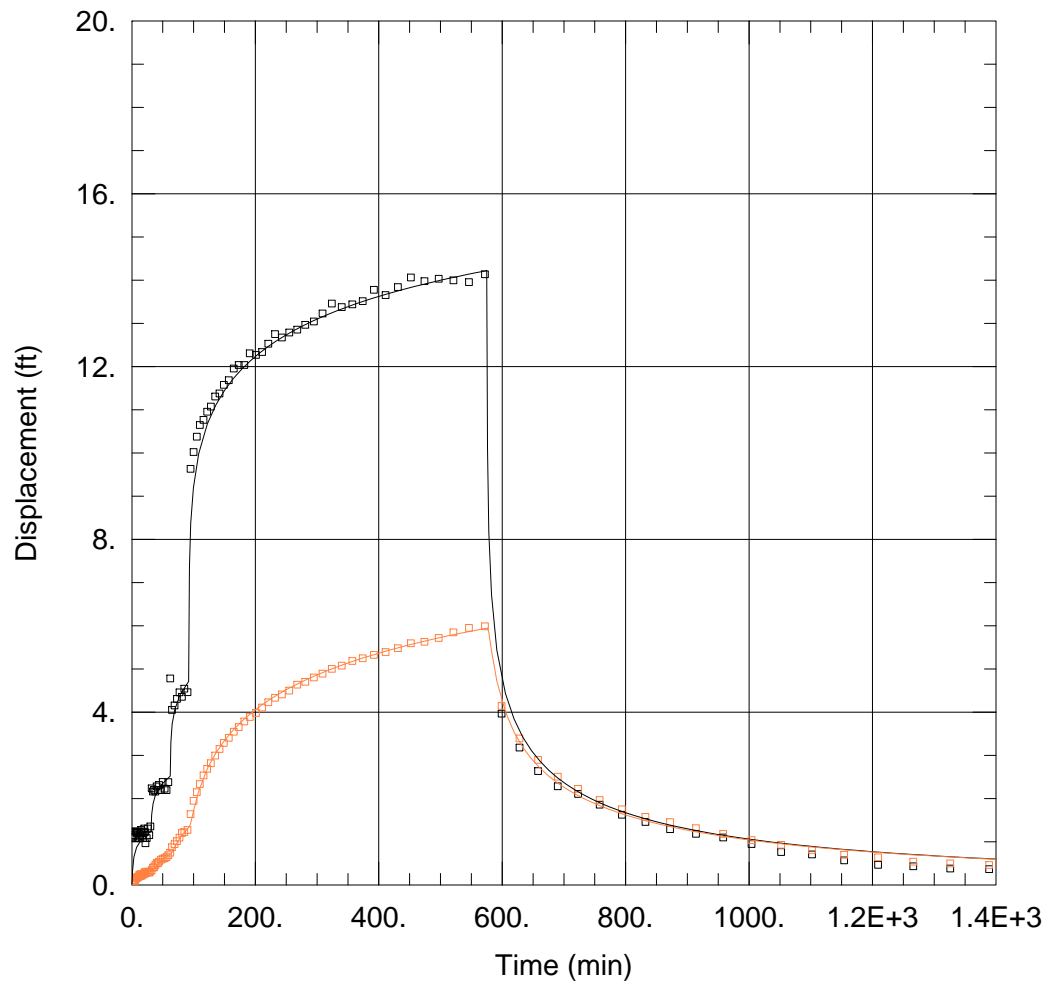
$P = 1.747$

Step Test Model: Jacob-Rorabaugh

Time (t) = 1. min Rate (Q) in cu. ft/min

$s(t) = 0.2973Q + 0.1318Q^{1.747}$

W.E. = 311.2% (Q from last step)



WELL TEST ANALYSIS

Data Set: C:\...\R-01_O-07_draft.aqt

Date: 07/23/18

Time: 04:20:21

AQUIFER DATA

Saturated Thickness: 841. ft

Aquitard Thickness (b'): 1. ft

Anisotropy Ratio (Kz/Kr): 1.

Aquitard Thickness (b''): 1. ft

WELL DATA

Pumping Wells

Well Name	X (ft)	Y (ft)
R-01	847692.93	746271.15

Observation Wells

Well Name	X (ft)	Y (ft)
□ R-01	847692.93	746271.15
□ O-07	847623.88	746270.61

SOLUTION

Aquifer Model: Leaky

$T = 410.9 \text{ ft}^2/\text{day}$

$1/B = 0.0009071 \text{ ft}^{-1}$

$C = 0.1318 \text{ min}^2/\text{ft}^5$

Solution Method: Hantush-Jacob

$S = 0.001363$

$S_w = -3.498$

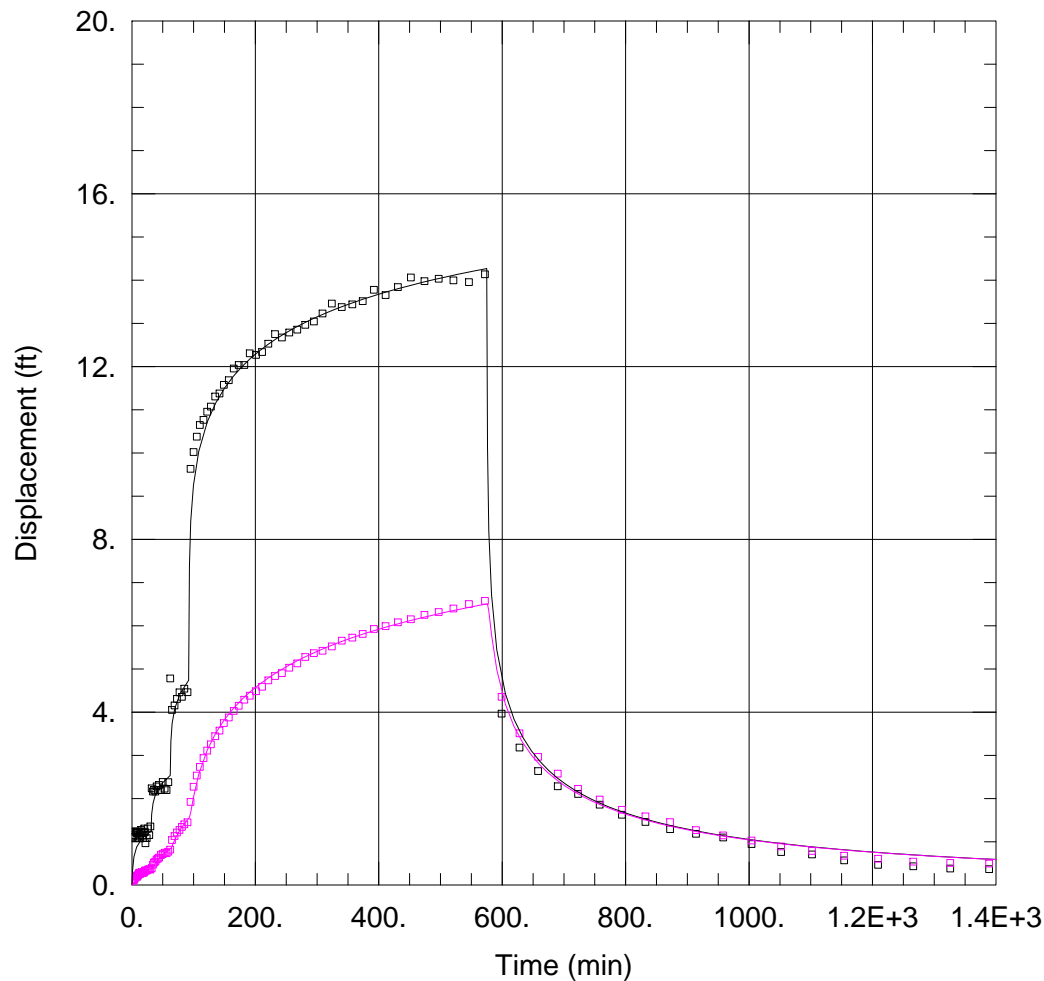
$P = 1.747$

Step Test Model: Jacob-Rorabaugh

Time (t) = 1. min Rate (Q) in cu. ft/min

$s(t) = 0.2907Q + 0.1318Q^{1.747}$

W.E. = 298.9% (Q from last step)



WELL TEST ANALYSIS

Data Set: C:\...\R-01_I-01_draft.aqt
Date: 07/22/18

Time: 00:31:26

AQUIFER DATA

Saturated Thickness: 841. ft
Aquitard Thickness (b'): 1. ft

Anisotropy Ratio (Kz/Kr): 1.
Aquitard Thickness (b''): 1. ft

WELL DATA

Pumping Wells

Well Name	X (ft)	Y (ft)
R-01	847692.93	746271.15

Observation Wells

Well Name	X (ft)	Y (ft)
□ R-01	847692.93	746271.15
□ I-01	847692.93	746200.45

SOLUTION

Aquifer Model: Leaky

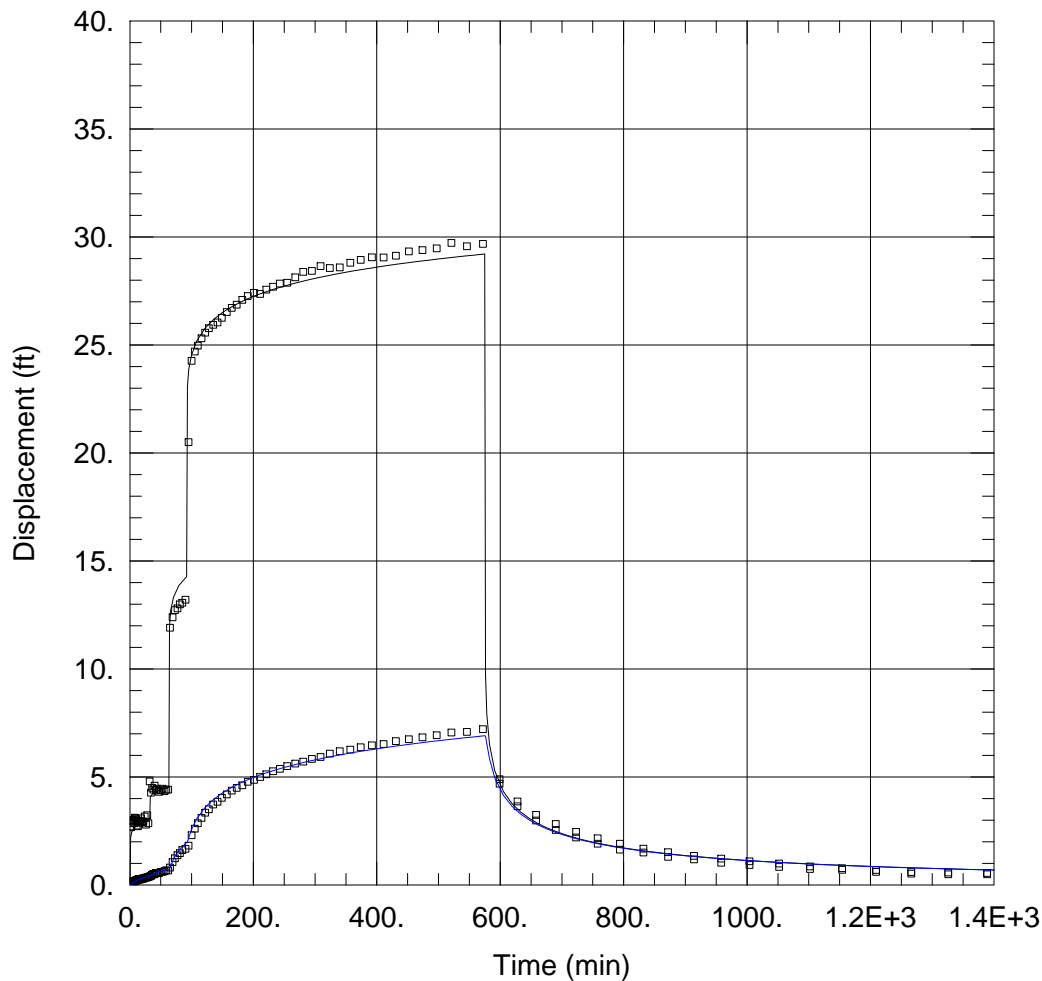
Solution Method: Hantush-Jacob

$T = 407.1 \text{ ft}^2/\text{day}$
 $1/B = 0.0008649 \text{ ft}^{-1}$
 $C = 0.1318 \text{ min}^2/\text{ft}^5$

$S = 0.001101$
 $S_w = -3.598$
 $P = 1.747$

Step Test Model: Jacob-Rorabaugh
Time (t) = 1. min Rate (Q) in cu. ft/min

$s(t) = 0.2939Q + 0.1318Q^{1.747}$
W.E. = 308. % (Q from last step)



WELL TEST ANALYSIS

Data Set: C:\Users\cgardner\Documents\Florence Copper Project\AQTESOLV\R-03\R-03_O-02_draft.aqt

Date: 06/06/18

Time: 17:22:44

AQUIFER DATA

Saturated Thickness: 824. ft

Aquitard Thickness (b'): 1. ft

Anisotropy Ratio (Kz/Kr): 1.

Aquitard Thickness (b''): 1. ft

WELL DATA

Pumping Wells

Well Name	X (ft)	Y (ft)
R-03	847834.33	746129.75

Observation Wells

Well Name	X (ft)	Y (ft)
□ R-03	847834.33	746129.75
□ O-02	847834.34	746200.46

SOLUTION

Aquifer Model: Leaky

$T = 433.9 \text{ ft}^2/\text{day}$

$1/B = 2.381\text{E-}5 \text{ ft}^{-1}$

$C = 0.3359 \text{ min}^2/\text{ft}^5$

Solution Method: Hantush-Jacob

$S = 0.0007787$

$S_w = -0.1943$

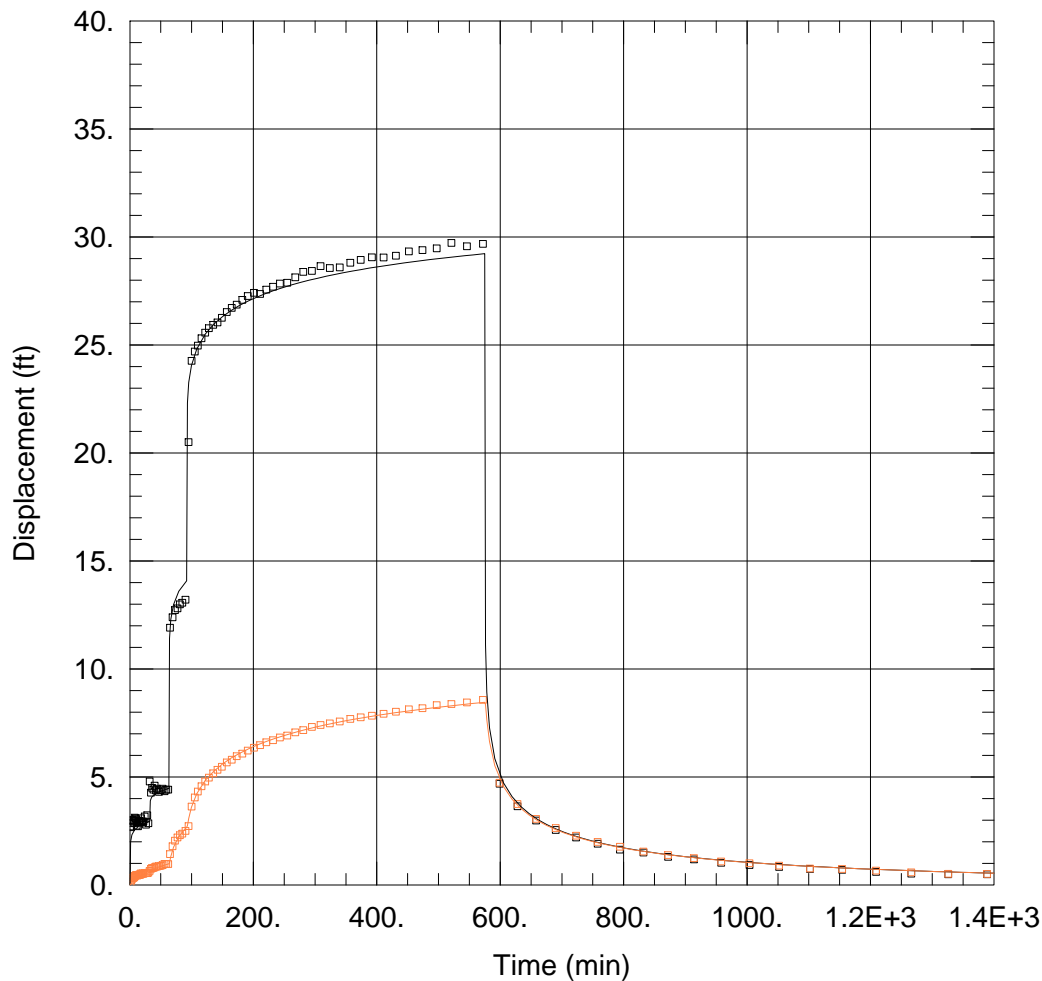
$P = 1.634$

Step Test Model: Jacob-Rorabaugh

Time (t) = 1. min Rate (Q) in cu. ft/min

$s(t) = 2.579Q + 0.3359Q^{1.634}$

W.E. = 75.33% (Q from last step)



WELL TEST ANALYSIS

Data Set: C:\Users\cgardner\Documents\Florence Copper Project\AQTESOLV\R-03\R-03_O-03_draft.aqt

Date: 06/06/18

Time: 17:22:47

AQUIFER DATA

Saturated Thickness: 824. ft

Aquitard Thickness (b'): 1. ft

Anisotropy Ratio (Kz/Kr): 1.

Aquitard Thickness (b''): 1. ft

WELL DATA

Pumping Wells

Well Name	X (ft)	Y (ft)
R-03	847834.33	746129.75

Observation Wells

Well Name	X (ft)	Y (ft)
□ R-03	847834.33	746129.75
□ O-03	847831.43	746053.02

SOLUTION

Aquifer Model: Leaky

$T = 363.5 \text{ ft}^2/\text{day}$

$1/B = 0.0007316 \text{ ft}^{-1}$

$C = 0.3359 \text{ min}^2/\text{ft}^5$

Solution Method: Hantush-Jacob

$S = 0.0003426$

$S_w = -1.494$

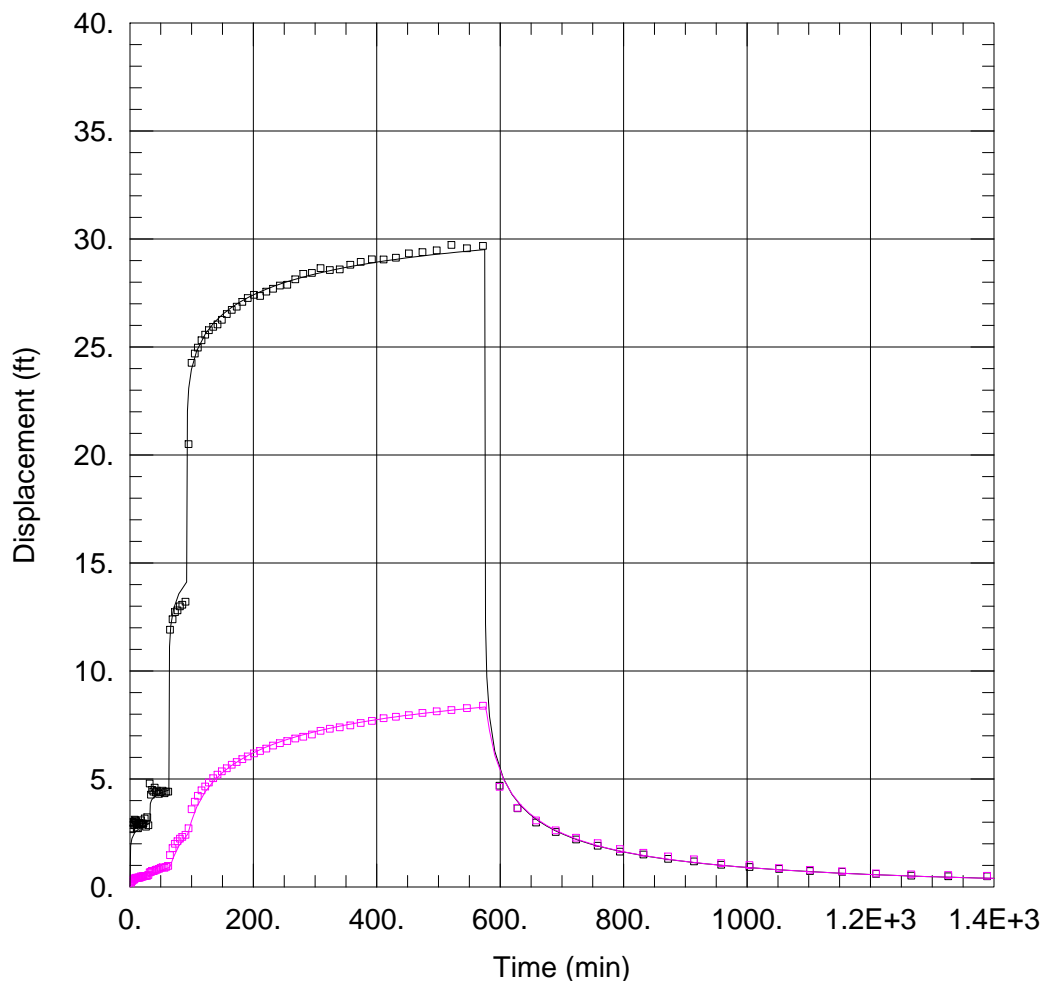
$P = 1.634$

Step Test Model: Jacob-Rorabaugh

Time (t) = 1. min Rate (Q) in cu. ft/min

$s(t) = 2.327Q + 0.3359Q^{1.634}$

W.E. = 98.82% (Q from last step)



WELL TEST ANALYSIS

Data Set: C:\Users\cgardner\Documents\Florence Copper Project\AQTESOLV\R-03\R-03_I-02_draft.aqt

Date: 06/06/18

Time: 17:22:38

AQUIFER DATA

Saturated Thickness: 824. ft

Aquitard Thickness (b'): 1. ft

Anisotropy Ratio (Kz/Kr): 1.

Aquitard Thickness (b''): 1. ft

WELL DATA

Pumping Wells

Well Name	X (ft)	Y (ft)
R-03	847834.33	746129.75

Observation Wells

Well Name	X (ft)	Y (ft)
□ R-03	847834.33	746129.75
□ I-02	847763.63	746129.75

SOLUTION

Aquifer Model: Leaky

$T = 330.9 \text{ ft}^2/\text{day}$

$1/B = 0.001638 \text{ ft}^{-1}$

$C = 0.3359 \text{ min}^2/\text{ft}^5$

Solution Method: Hantush-Jacob

$S = 0.0007787$

$S_w = -1.494$

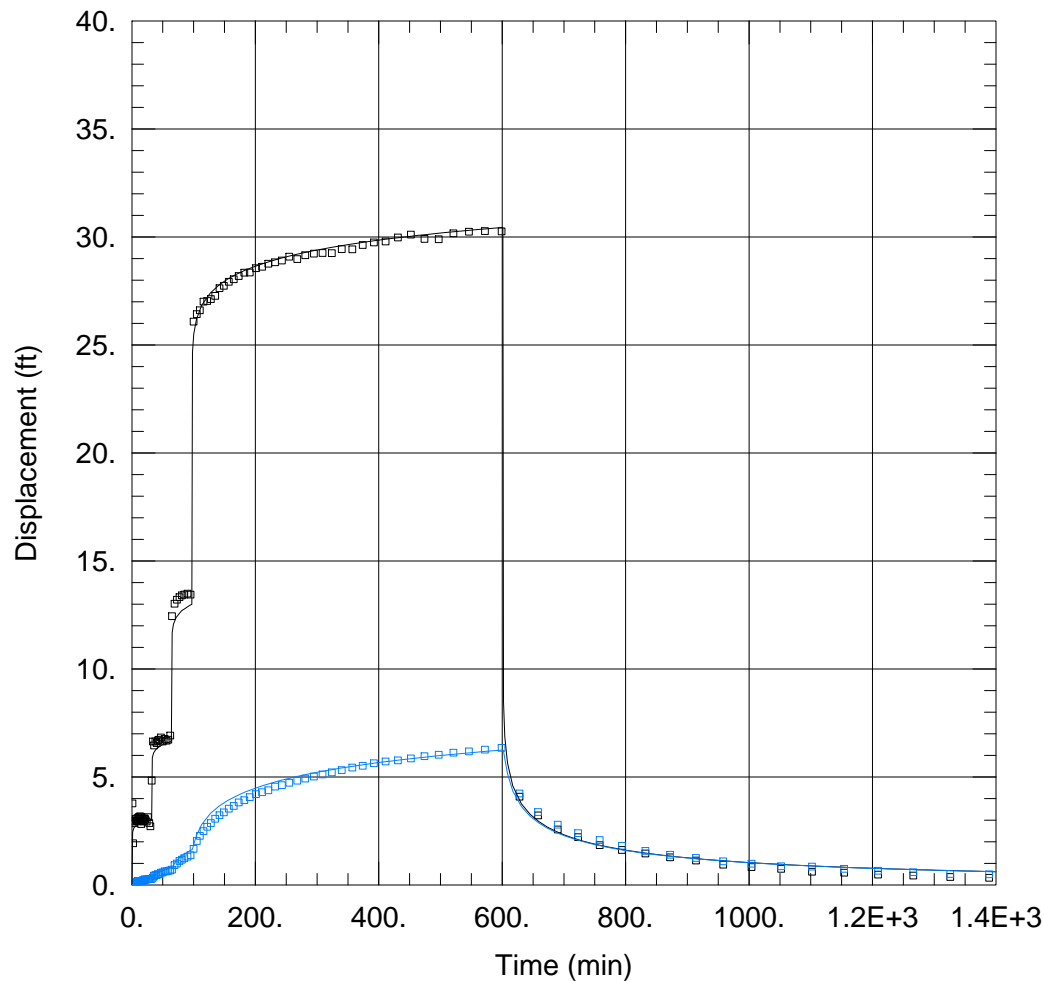
$P = 1.634$

Step Test Model: Jacob-Rorabaugh

Time (t) = 1. min Rate (Q) in cu. ft/min

$s(t) = 2.181Q + 0.3359Q^{1.634}$

W.E. = 101.7% (Q from last step)



WELL TEST ANALYSIS

Data Set: C:\Users\cgardner\Documents\Florence Copper Project\AQTESOLV\R-05\R-05_O-04_draft.aqt

Date: 06/06/18

Time: 12:50:09

AQUIFER DATA

Saturated Thickness: 824. ft

Aquitard Thickness (b'): 1. ft

Anisotropy Ratio (Kz/Kr): 1.

Aquitard Thickness (b''): 1. ft

WELL DATA

Pumping Wells

Well Name	X (ft)	Y (ft)
R-05	847692.91	745988.33

Observation Wells

Well Name	X (ft)	Y (ft)
□ R-05	847692.91	745988.33
□ O-04	847622.22	745987.44

SOLUTION

Aquifer Model: Leaky

$T = 522.4 \text{ ft}^2/\text{day}$

$1/B = 0.0002693 \text{ ft}^{-1}$

$C = 0.1307 \text{ min}^2/\text{ft}^5$

Solution Method: Hantush-Jacob

$S = 0.0007787$

$S_w = 2.338$

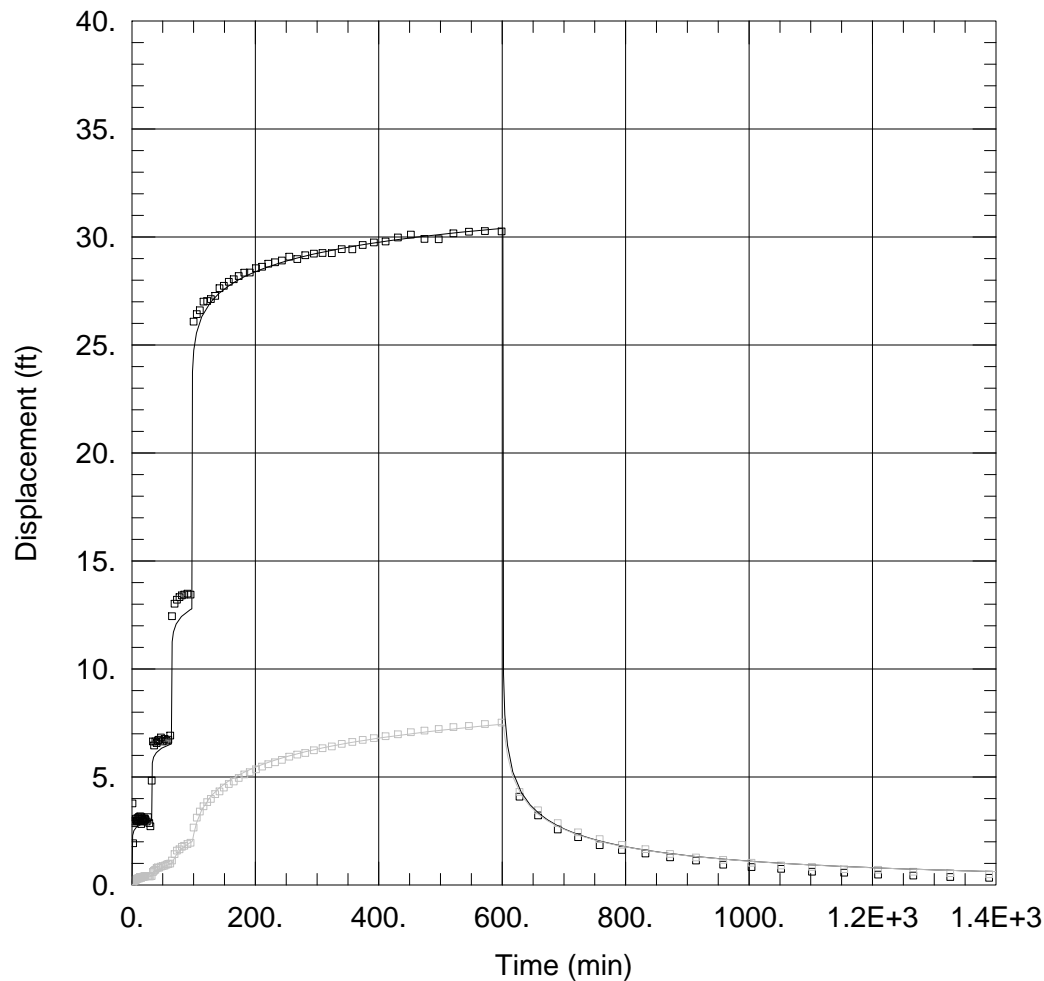
$P = 1.5$

Step Test Model: Jacob-Rorabaugh

Time (t) = 1. min Rate (Q) in cu. ft/min

$s(t) = 3.538Q + 0.1307Q^{1.5}$

W.E. = 65.26% (Q from last step)



WELL TEST ANALYSIS

Data Set: C:\Users\cgardner\Documents\Florence Copper Project\AQTESOLV\R-05\R-05_I-03_draft.aqt

Date: 06/06/18

Time: 12:50:43

AQUIFER DATA

Saturated Thickness: 824. ft

Aquitard Thickness (b'): 1. ft

Anisotropy Ratio (Kz/Kr): 1.

Aquitard Thickness (b''): 1. ft

WELL DATA

Pumping Wells

Well Name	X (ft)	Y (ft)
R-05	847692.91	745988.33

Observation Wells

Well Name	X (ft)	Y (ft)
□ R-05	847692.91	745988.33
□ I-03	847692.92	746059.04

SOLUTION

Aquifer Model: Leaky

$T = 446.7 \text{ ft}^2/\text{day}$

$1/B = 0.0005854 \text{ ft}^{-1}$

$C = 0.1307 \text{ min}^2/\text{ft}^5$

Solution Method: Hantush-Jacob

$S = 0.0005967$

$S_w = 0.9383$

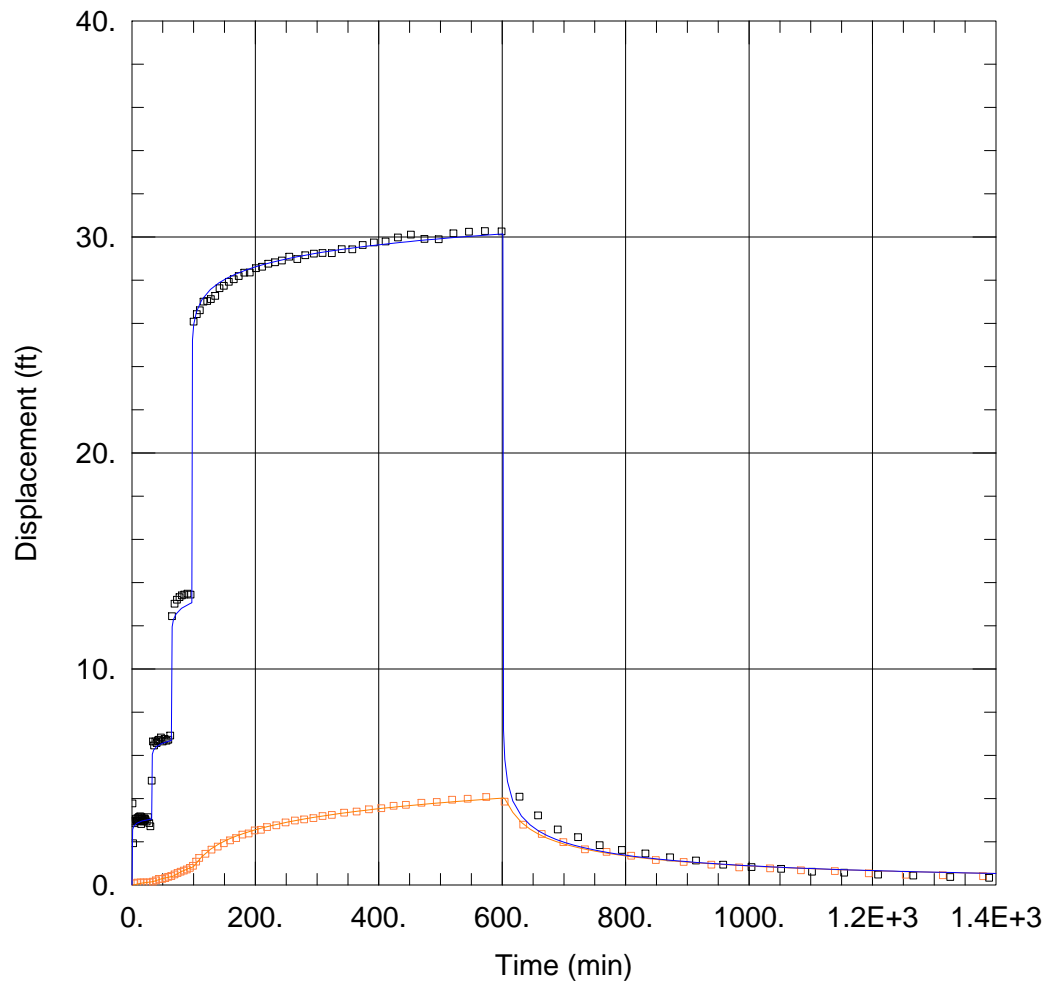
$P = 1.5$

Step Test Model: Jacob-Rorabaugh

Time (t) = 1. min Rate (Q) in cu. ft/min

$s(t) = 3.3Q + 0.1307Q^{1.5}$

W.E. = 78.04% (Q from last step)



WELL TEST ANALYSIS

Data Set: C:\Users\cgardner\Documents\Florence Copper Project\AQTESOLV\R-05\R-05_M60-O_draft.aqt
 Date: 06/06/18 Time: 12:50:05

AQUIFER DATA

Saturated Thickness: 824. ft
 Aquitard Thickness (b'): 1. ft

Anisotropy Ratio (Kz/Kr): 1.
 Aquitard Thickness (b''): 1. ft

WELL DATA

Pumping Wells

Well Name	X (ft)	Y (ft)
R-05	847692.91	745988.33

Observation Wells

Well Name	X (ft)	Y (ft)
□ <u>M60-O</u>	847599	745904
□ <u>R-05</u>	847692.91	745988.33

SOLUTION

Aquifer Model: Leaky

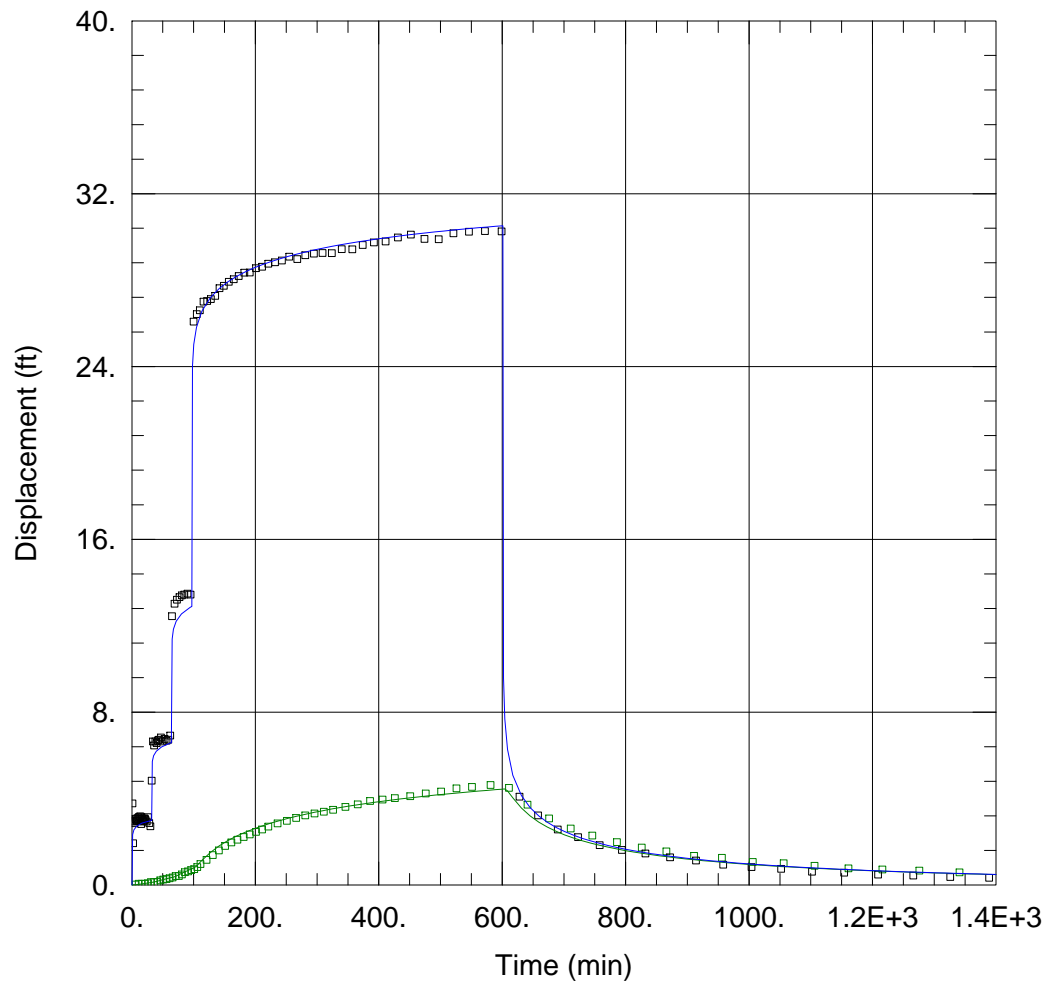
Solution Method: Hantush-Jacob

$T = 614.8 \text{ ft}^2/\text{day}$
 $1/B = 0.0001664 \text{ ft}^{-1}$
 $C = 0.1307 \text{ min}^2/\text{ft}^5$

$S = 0.0007947$
 $S_w = 3.838$
 $P = 1.5$

Step Test Model: Jacob-Rorabaugh
 Time (t) = 1. min Rate (Q) in cu. ft/min

$s(t) = -0.3115Q + 0.1307Q^{1.5}$
 W.E. = -1.188E+7% (Q from last step)



WELL TEST ANALYSIS

Data Set: C:\...\R-05_MW-01-O_draft.aqt

Date: 06/06/18

Time: 12:50:07

AQUIFER DATA

Saturated Thickness: 824. ft

Aquitard Thickness (b'): 1. ft

Anisotropy Ratio (Kz/Kr): 1.

Aquitard Thickness (b''): 1. ft

WELL DATA

Pumping Wells

Well Name	X (ft)	Y (ft)
R-05	847692.91	745988.33

Observation Wells

Well Name	X (ft)	Y (ft)
□ <u>MW-01-O</u>	847846.92	746356.72
□ <u>R-05</u>	847692.91	745988.33

SOLUTION

Aquifer Model: Leaky

$T = 425.9 \text{ ft}^2/\text{day}$

$1/B = 0.0003962 \text{ ft}^{-1}$

$C = 0.1307 \text{ min}^2/\text{ft}^5$

Solution Method: Hantush-Jacob

$S = 0.0001016$

$S_w = -0.06169$

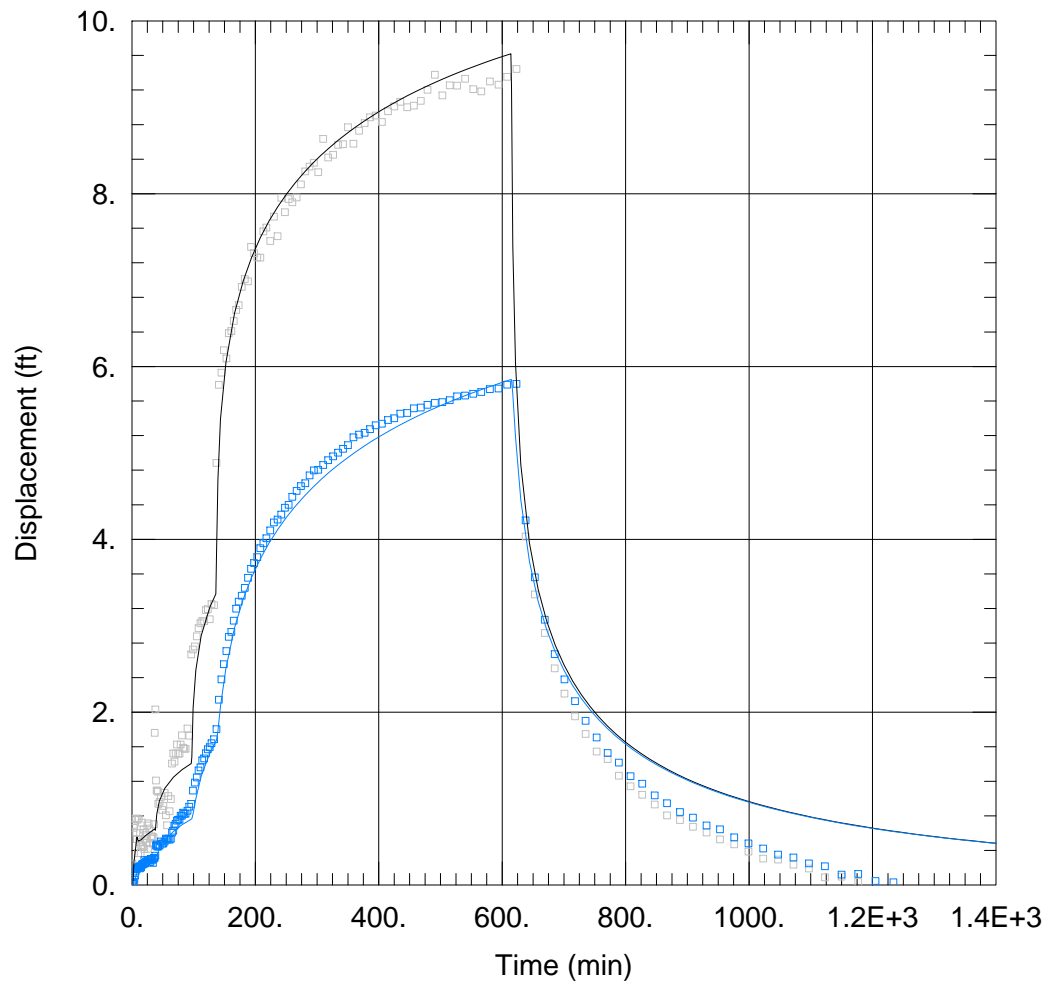
$P = 1.5$

Step Test Model: Jacob-Rorabaugh

Time (t) = 1. min Rate (Q) in cu. ft/min

$s(t) = -0.2762Q + 0.1307Q^{1.5}$

W.E. = -687.6% (Q from last step)



WELL TEST ANALYSIS

Data Set: C:\Users\cgardner\Documents\Florence Copper Project\AQTESOLV\R-07_O-05_draft.aqt

Date: 06/06/18

Time: 10:44:23

AQUIFER DATA

Saturated Thickness: 824. ft

Aquitard Thickness (b'): 1. ft

Anisotropy Ratio (Kz/Kr): 1.

Aquitard Thickness (b''): 1. ft

WELL DATA

Pumping Wells

Well Name	X (ft)	Y (ft)
R-07	847551.51	746129.73

Observation Wells

Well Name	X (ft)	Y (ft)
□ R-07	847551.51	746129.73
□ <u>O-05</u>	847692.91	745988.33

SOLUTION

Aquifer Model: Leaky

$T = 407.1 \text{ ft}^2/\text{day}$

$1/B = 0.000438 \text{ ft}^{-1}$

$C = 0.087 \text{ min}^2/\text{ft}^5$

Solution Method: Hantush-Jacob

$S = 0.0001307$

$S_w = -5.363$

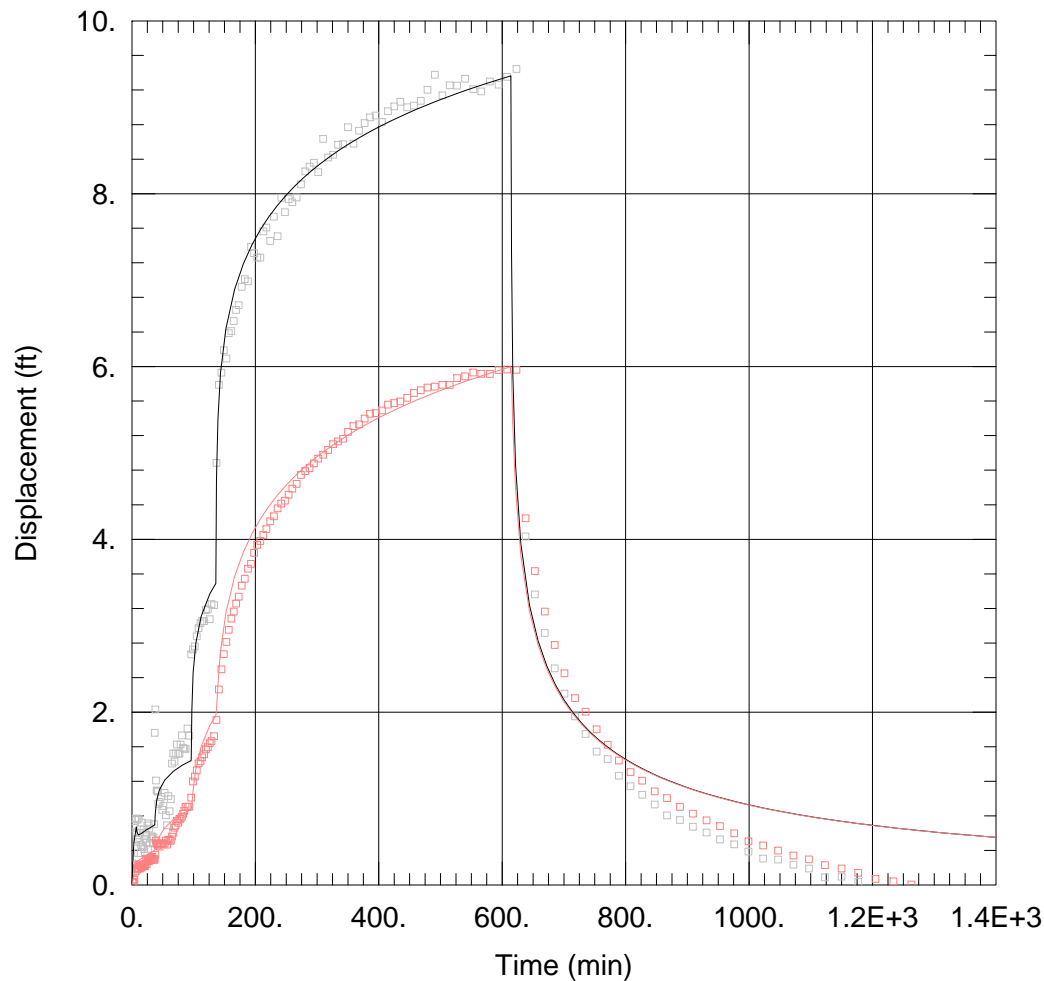
$P = 1.639$

Step Test Model: Jacob-Rorabaugh

Time (t) = 1. min Rate (Q) in cu. ft/min

$s(t) = -0.1975Q + 0.087Q^{1.639}$

W.E. = 5474.% (Q from last step)



WELL TEST ANALYSIS

Data Set: C:\Users\cgardner\Documents\Florence Copper Project\AQTESOLV\R-07 _O-06_draft.aqt
 Date: 06/06/18 Time: 10:44:04

AQUIFER DATA

Saturated Thickness: 824. ft
 Aquitard Thickness (b'): 1. ft

Anisotropy Ratio (Kz/Kr): 1.
 Aquitard Thickness (b''): 1. ft

WELL DATA

Pumping Wells

Well Name	X (ft)	Y (ft)
R-07	847551.51	746129.73

Observation Wells

Well Name	X (ft)	Y (ft)
□ R-07	847551.51	746129.73
□ O-06	847551.52	746200.44

SOLUTION

Aquifer Model: Leaky

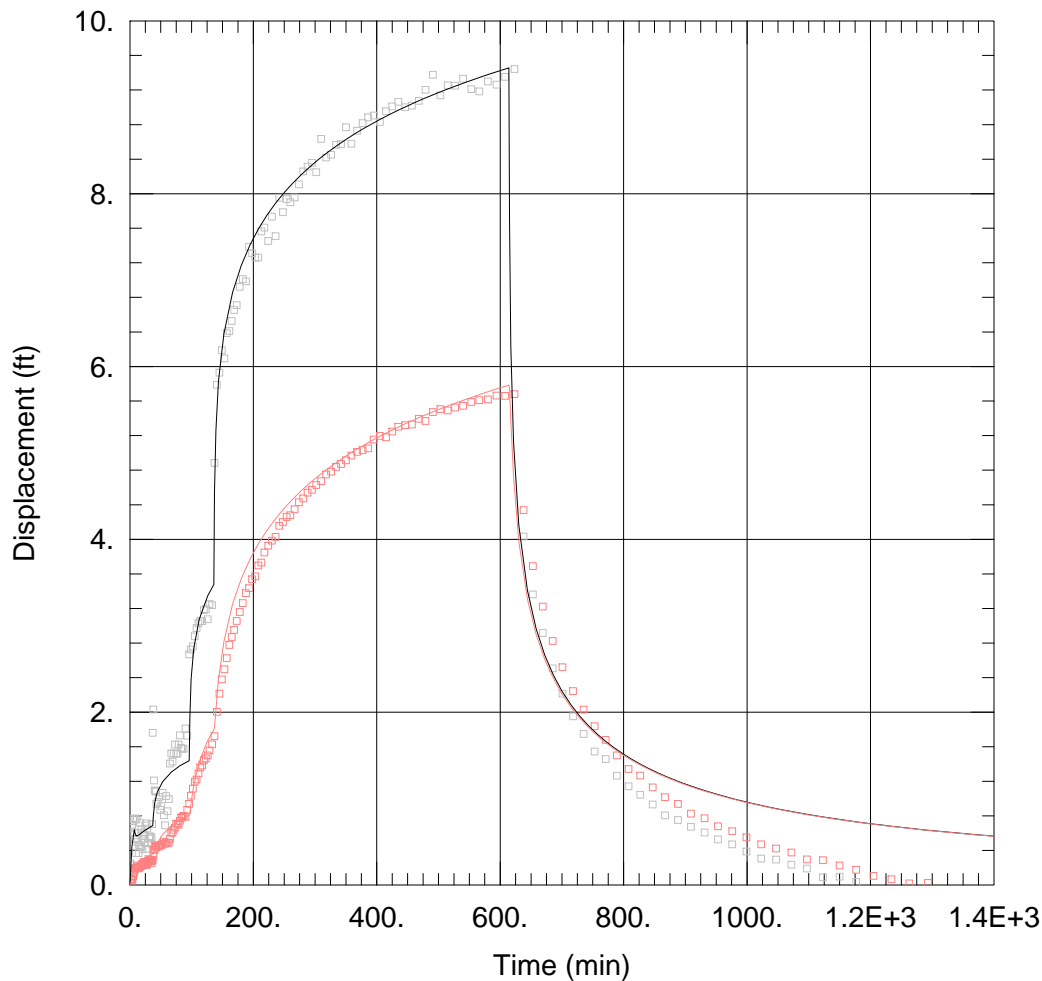
Solution Method: Hantush-Jacob

$T = 544.3 \text{ ft}^2/\text{day}$
 $1/B = 2.381\text{E-}5 \text{ ft}^{-1}$
 $C = 0.087 \text{ min}^2/\text{ft}^5$

$S = 0.0005$
 $S_w = -4.315$
 $P = 1.639$

Step Test Model: Jacob-Rorabaugh
 Time (t) = 1. min Rate (Q) in cu. ft/min

$s(t) = 0.1263Q + 0.087Q^{1.639}$
 W.E. = 517.7% (Q from last step)



WELL TEST ANALYSIS

Data Set: C:\Users\cgardner\Documents\Florence Copper Project\AQTESOLV\R-07_I-04_draft.aqt

Date: 06/06/18

Time: 10:44:13

AQUIFER DATA

Saturated Thickness: 824. ft

Aquitard Thickness (b'): 1. ft

Anisotropy Ratio (Kz/Kr): 1.

Aquitard Thickness (b''): 1. ft

WELL DATA

Pumping Wells

Well Name	X (ft)	Y (ft)
R-07	847551.51	746129.73

Observation Wells

Well Name	X (ft)	Y (ft)
□ R-07	847551.51	746129.73
□ I-04	847622.23	746129.75

SOLUTION

Aquifer Model: Leaky

$T = 522.5 \text{ ft}^2/\text{day}$

$1/B = 0.0001888 \text{ ft}^{-1}$

$C = 0.087 \text{ min}^2/\text{ft}^5$

Solution Method: Hantush-Jacob

$S = 0.0007522$

$S_w = -4.215$

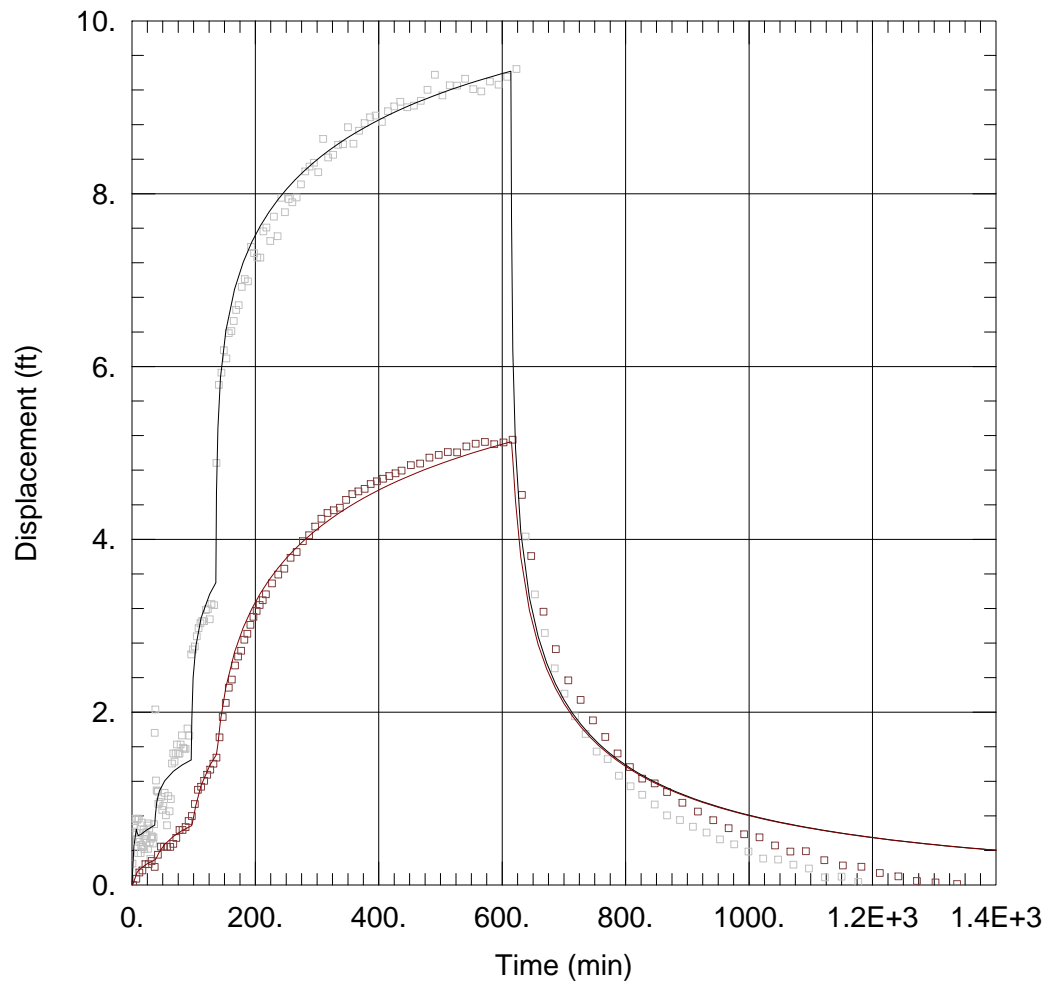
$P = 1.639$

Step Test Model: Jacob-Rorabaugh

Time (t) = 1. min Rate (Q) in cu. ft/min

$s(t) = 0.06785Q + 0.087Q^{1.639}$

W.E. = 604.9% (Q from last step)



WELL TEST ANALYSIS

Data Set: C:\Users\cgardner\Documents\Florence Copper Project\AQTESOLV\R-07_M57-O_draft.aqt
 Date: 06/06/18 Time: 10:44:16

AQUIFER DATA

Saturated Thickness: 824. ft
 Aquitard Thickness (b'): 1. ft

Anisotropy Ratio (Kz/Kr): 1.
 Aquitard Thickness (b''): 1. ft

WELL DATA

Pumping Wells

Well Name	X (ft)	Y (ft)
R-07	847551.51	746129.73

Observation Wells

Well Name	X (ft)	Y (ft)
□ R-07	847551.51	746129.73
□ M57-O	847378	746249

SOLUTION

Aquifer Model: Leaky

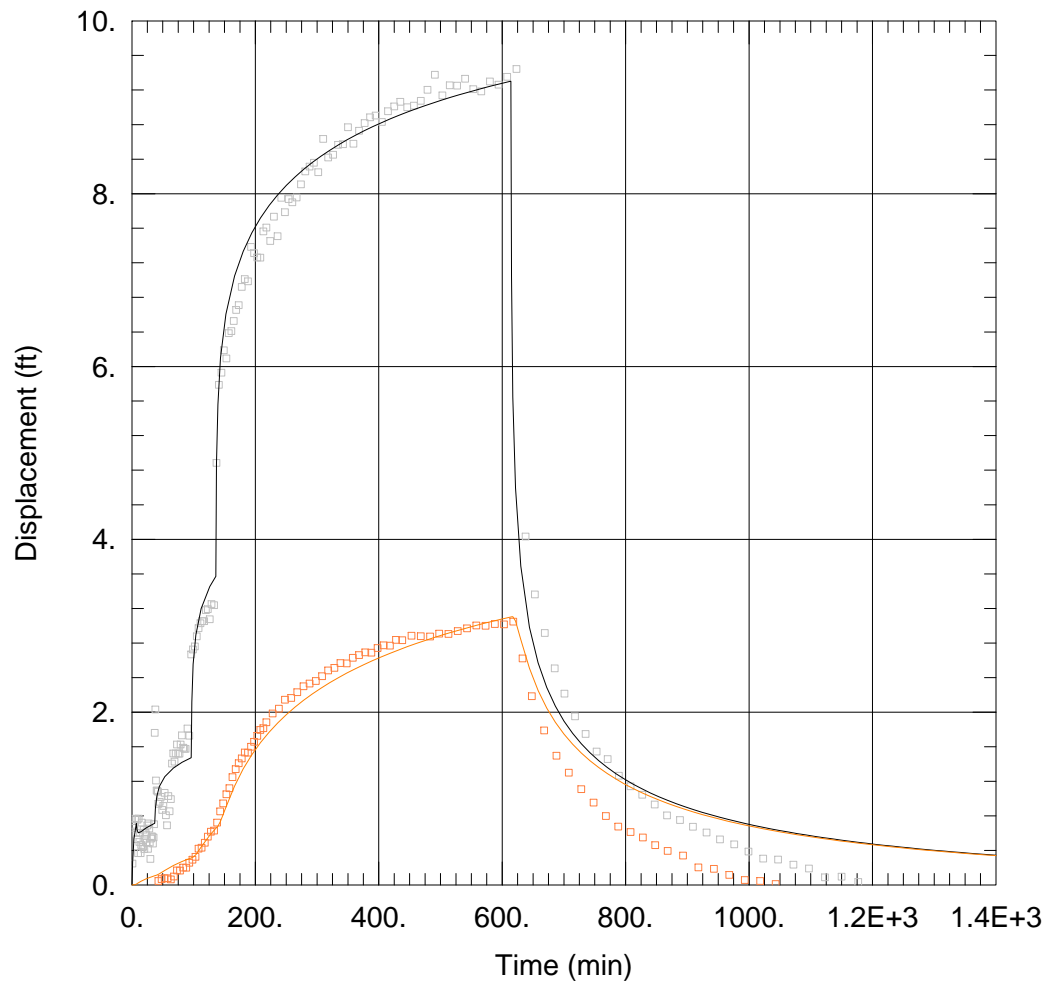
Solution Method: Hantush-Jacob

$T = 482.1 \text{ ft}^2/\text{day}$
 $1/B = 0.0003795 \text{ ft}^{-1}$
 $C = 0.087 \text{ min}^2/\text{ft}^5$

$S = 0.0001123$
 $S_w = -5.126$
 $P = 1.639$

Step Test Model: Jacob-Rorabaugh
 Time (t) = 1. min Rate (Q) in cu. ft/min

$s(t) = 0.0575Q + 0.087Q^{1.639}$
 W.E. = 813.7% (Q from last step)



WELL TEST ANALYSIS

Data Set: C:\Users\cgardner\Documents\Florence Copper Project\AQTESOLV\R-07_M60-O_draft.aqt

Date: 06/06/18

Time: 10:44:18

AQUIFER DATA

Saturated Thickness: 824. ft

Aquitard Thickness (b'): 1. ft

Anisotropy Ratio (Kz/Kr): 1.

Aquitard Thickness (b''): 1. ft

WELL DATA

Pumping Wells

Well Name	X (ft)	Y (ft)
R-07	847551.51	746129.73

Observation Wells

Well Name	X (ft)	Y (ft)
□ R-07	847551.51	746129.73
□ M60-O	847599	745904

SOLUTION

Aquifer Model: Leaky

$T = 543.9 \text{ ft}^2/\text{day}$

$1/B = 0.0007201 \text{ ft}^{-1}$

$C = 0.087 \text{ min}^2/\text{ft}^5$

Solution Method: Hantush-Jacob

$S = 0.000423$

$S_w = -4.315$

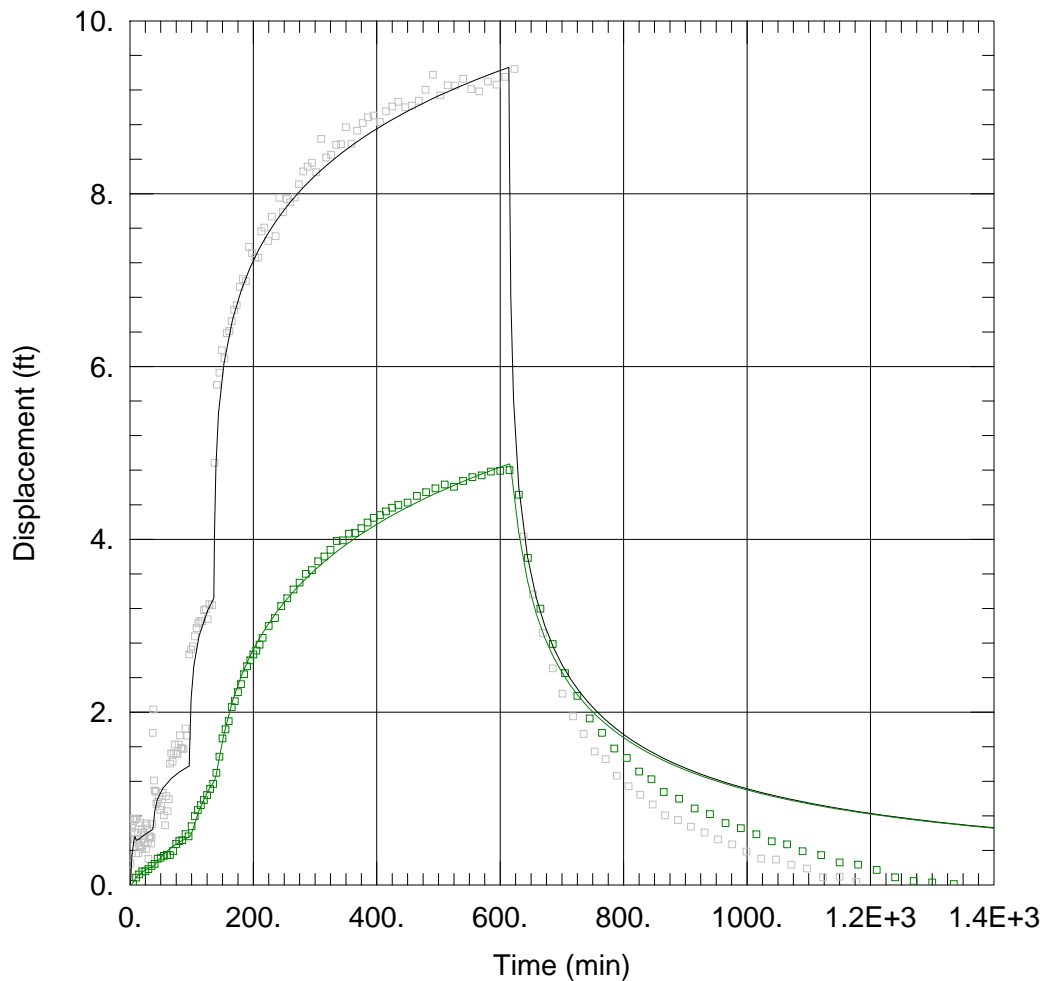
$P = 1.639$

Step Test Model: Jacob-Rorabaugh

Time (t) = 1. min Rate (Q) in cu. ft/min

$s(t) = 0.1677Q + 0.087Q^{1.639}$

W.E. = 476.5% (Q from last step)



WELL TEST ANALYSIS

Data Set: C:\Users\cgardner\Documents\Florence Copper Project\AQTESOLV\R-07_MW-01-O_draft.aqt
 Date: 06/06/18 Time: 10:44:20

AQUIFER DATA

Saturated Thickness: 824. ft
 Aquitard Thickness (b'): 1. ft

Anisotropy Ratio (Kz/Kr): 1.
 Aquitard Thickness (b''): 1. ft

WELL DATA

Pumping Wells

Well Name	X (ft)	Y (ft)
R-07	847551.51	746129.73

Observation Wells

Well Name	X (ft)	Y (ft)
□ R-07	847551.51	746129.73
□ MW-01-O	847846.92	746356.72

SOLUTION

Aquifer Model: Leaky

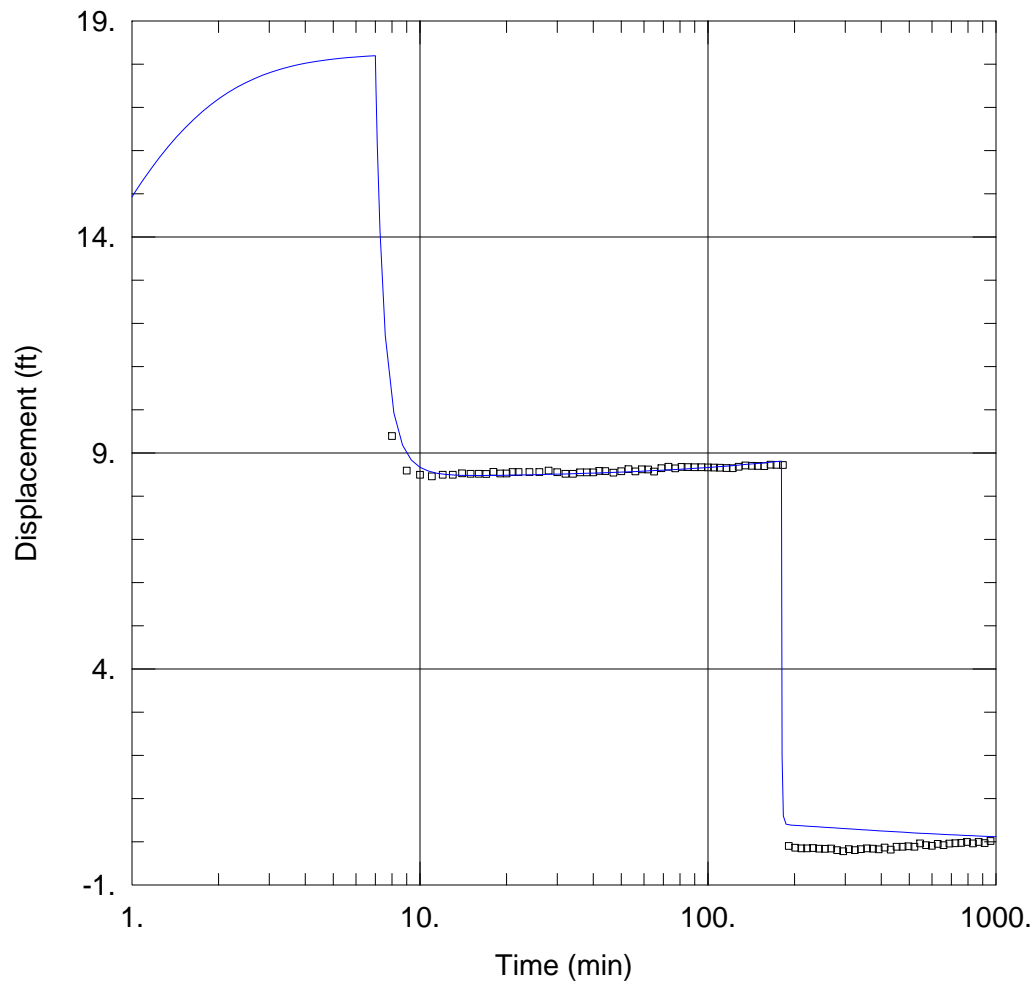
Solution Method: Hantush-Jacob

$T = 452.6 \text{ ft}^2/\text{day}$
 $1/B = 2.381\text{E-}5 \text{ ft}^{-1}$
 $C = 0.087 \text{ min}^2/\text{ft}^5$

$S = 6.508\text{E-}5$
 $S_w = -5.565$
 $P = 1.639$

Step Test Model: Jacob-Rorabaugh
 Time (t) = 1. min Rate (Q) in cu. ft/min

$s(t) = -0.06722Q + 0.087Q^{1.639}$
 W.E. = 1512.7% (Q from last step)



WELL TEST ANALYSIS

Data Set: C:\...\M55-UBF_single well_draft.aqt

Date: 07/23/18

Time: 08:51:03

AQUIFER DATA

Saturated Thickness: 39. ft

Anisotropy Ratio (Kz/Kr): 1.

WELL DATA

Pumping Wells

Well Name	X (ft)	Y (ft)
M55-UBF	847541	746281

Observation Wells

Well Name	X (ft)	Y (ft)
□ M55-UBF	847541	746281

SOLUTION

Aquifer Model: Unconfined

Solution Method: Moench

T = 482.5 ft²/day

S = 0.001161

Sy = 0.13

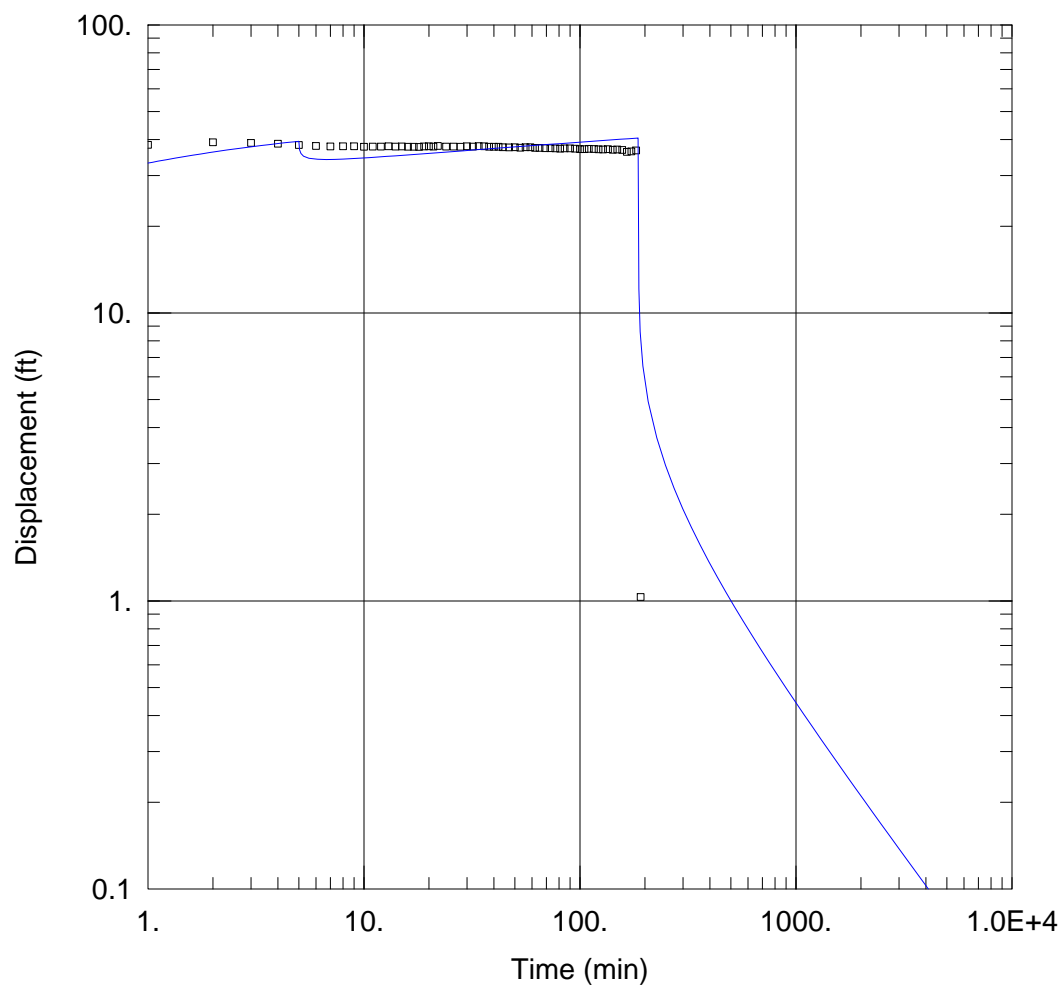
β = 0.0001273

Sw = 0.

r(w) = 0.44 ft

r(c) = 0.21 ft

alpha = 1.0E+30 min⁻¹



WELL TEST ANALYSIS

Data Set: C:\...\M56-LBF_single well_draft.aqt

Date: 07/23/18

Time: 08:51:21

WELL DATA

Pumping Wells

Well Name	X (ft)	Y (ft)
M56-LBF	0	0

Observation Wells

Well Name	X (ft)	Y (ft)
□ M56-LBF	0	0

SOLUTION

Aquifer Model: Confined

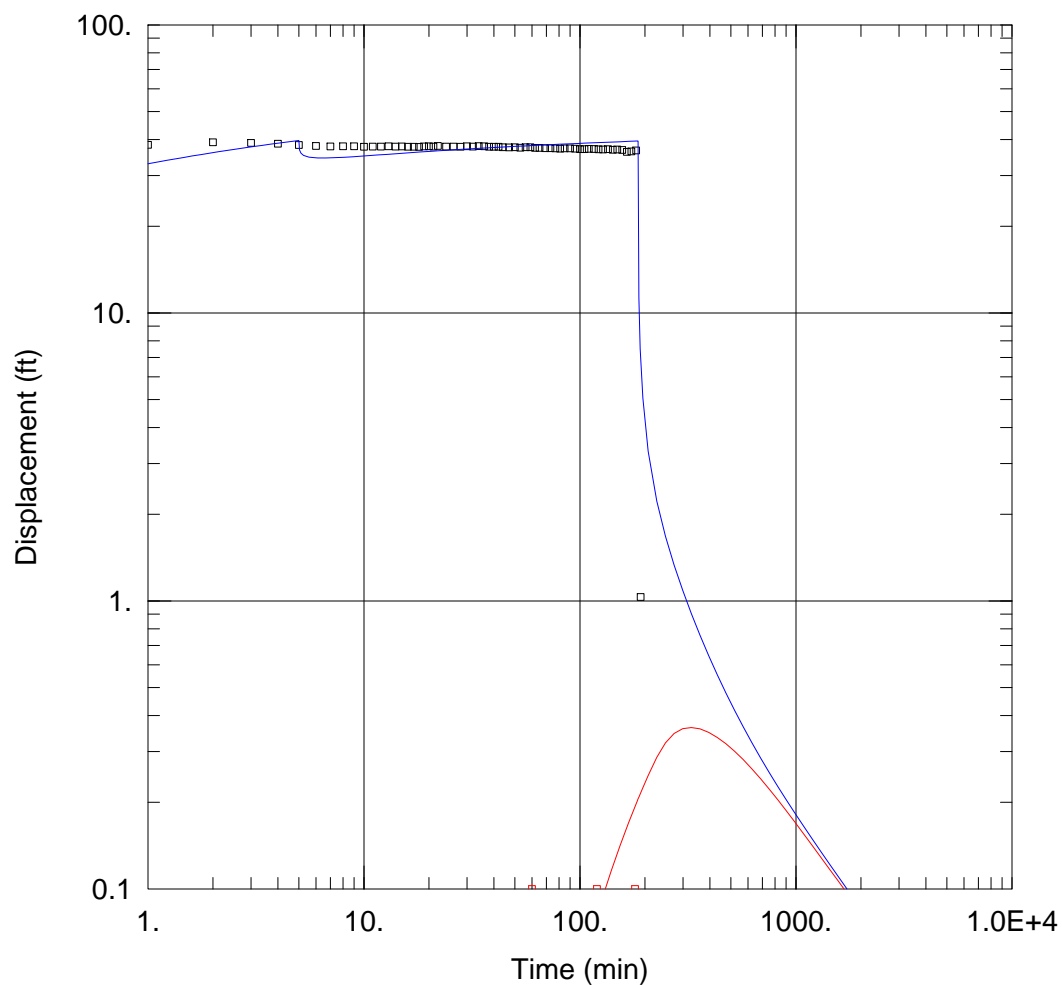
Solution Method: Theis

$T = 107.2 \text{ ft}^2/\text{day}$

$S = 0.003208$

$Kz/Kr = 1.$

$b = 50. \text{ ft}$



WELL TEST ANALYSIS

Data Set: C:\...\M56-LBF_single well_draft_jc.aqt

Date: 07/23/18

Time: 09:27:25

WELL DATA

Pumping Wells

Well Name	X (ft)	Y (ft)
M56-LBF	0	0

Observation Wells

Well Name	X (ft)	Y (ft)
□ M56-LBF	0	0
□ O-06	109	0

SOLUTION

Aquifer Model: Confined

Solution Method: Theis

T = 264. ft²/day

S = 0.003208

Kz/Kr = 0.1

b = 100. ft

EXHIBIT D-5

**Memorandum: Summary of Bulk Conductivity Monitoring Results,
First Quarter 2019, Production Test Facility
(prepared by Haley & Aldrich, Inc.)**



HALEY & ALDRICH, INC.
One Arizona Center
400 E. Van Buren St., Suite 545
Phoenix, AZ 85004
602.760.2450

MEMORANDUM

26 April 2019
File No. 132473-003

TO: Florence Copper Inc.
Mr. Dan Johnson V.P., General Manager

C: Florence Copper Inc.
Mr. Ian Ream, Senior Hydrogeologist

FROM: Haley & Aldrich, Inc.
Mark Nicholls, R.G.

SUBJECT: Summary of Bulk Conductivity Monitoring Results, First Quarter 2019
Production Test Facility
Florence Copper, Florence, Arizona

Haley & Aldrich, Inc. (Haley & Aldrich) has conducted statistical analysis of bulk electrical conductivity data collected by HydroGeophysics, Inc. at the Production Test Facility (PTF) located in Florence, Arizona, in accordance with Temporary Aquifer Protection Permit (APP) No. 106360 and the Underground Injection Control (UIC) Permit No R9UIC-AZ3-FR11-1. The procedures used to complete the analysis were described in the document titled *Procedures for Determining Bulk Electrical Conductivity Alert Levels* (Haley & Aldrich, 2018)¹. The alert levels (ALs) for bulk electrical conductivity were approved in the letter issued by the U.S. Environmental Protection Agency dated 14 December 2018 and were adopted into the APP issued by the Arizona Department of Environmental Quality on 5 December 2018.

Alert Levels

To ensure that In-Situ Copper Recovery fluids do not enter the lower basin-fill unit from the bedrock oxide unit, the three upper horizons (1 through 3) are monitored. The following ALs were established for these horizons:

Electrode Pair Horizon	Proposed Alert Level (ohm-meters)
Horizon 1	9.93
Horizon 2	10.12
Horizon 3	10.33

¹ Haley & Aldrich, Inc., 2018. *Procedures for Determining Bulk Electrical Conductivity Alert Levels, Production Test Facility, Florence Copper Project*. August.

The ALs represent minimum values, if the measured apparent resistivity in one of these horizons is *lower* than the established AL on three adjacent or intersecting current paths, this constitutes an exceedance.

First Quarter 2019 Monitoring Results

First quarter (Q1) 2019 includes 13 weekly monitoring events for bulk electrical conductivity between 3 January and 28 March. No AL exceedances occurred during the monitoring period.

One current path in the uppermost horizon yielded a conductivity value that was below the AL for one monitoring event. The value could not be reproduced during subsequent monitoring and is therefore attributed to instrument drift or electronic noise, and is considered to be an outlier. The low value occurred in Horizon 1, 40 feet above the lower basin fill unit/oxide contact, on 6 March 2019, between sending well O-05 and receiving well O-06. The recorded exceedance value was 9.91 ohm-meters (Ω -m). This value is 0.02 Ω -m below the established 9.93 Ω -m alert level. Linear contour maps for the monitoring period detail these results (Figures 1 through 13).

Data Summary

Tables 1 through 3 list the apparent resistivity results over this monitoring period for Horizons 1 through 3, respectively.

Relative to the baseline dataset, one outlier was detected on these monitoring dates (defined as values over 4 times the interquartile range outside the range around the data median). However, the grouped data from each horizon fall within the range of the baseline dataset (Attachment A).

Attachment B shows the data from each horizon over time, during the baseline period, and monitoring both before and after the PTF became operational. The data collected during Q1 is within the established tolerance limits.

Enclosures:

Table 1 – Bulk Electrical Conductivity Monitoring Results, Horizon 1 (40 Feet Above LBFU/Oxide Contact)

Table 2 – Bulk Electrical Conductivity Monitoring Results, Horizon 2 (20 Feet Above LBFU/Oxide Contact)

Table 3 – Bulk Electrical Conductivity Monitoring Results, Horizon 3 (at LBFU/Oxide Contact)

Figure 1 – Baseline Apparent Resistivity of Electrode Pairs by Horizon – 01/03/2019, Production Test Facility

Figure 2 – Baseline Apparent Resistivity of Electrode Pairs by Horizon – 01/11/2019, Production Test Facility

Figure 3 – Baseline Apparent Resistivity of Electrode Pairs by Horizon – 01/17/2019, Production Test Facility

Figure 4 – Baseline Apparent Resistivity of Electrode Pairs by Horizon – 01/24/2019, Production Test Facility

Figure 5 – Baseline Apparent Resistivity of Electrode Pairs by Horizon – 01/31/2019, Production Test Facility

Figure 6 – Baseline Apparent Resistivity of Electrode Pairs by Horizon – 02/08/2019, Production Test Facility

Figure 7 – Baseline Apparent Resistivity of Electrode Pairs by Horizon – 02/14/2019, Production Test Facility

Figure 8 – Baseline Apparent Resistivity of Electrode Pairs by Horizon – 02/21/2019, Production Test Facility

Figure 9 – Baseline Apparent Resistivity of Electrode Pairs by Horizon – 02/28/2019, Production Test Facility

Figure 10 – Baseline Apparent Resistivity of Electrode Pairs by Horizon – 03/06/2019, Production Test Facility

Figure 11 – Baseline Apparent Resistivity of Electrode Pairs by Horizon – 03/14/2019, Production Test Facility

Figure 12 – Baseline Apparent Resistivity of Electrode Pairs by Horizon – 03/21/2019, Production Test Facility

Figure 13 – Baseline Apparent Resistivity of Electrode Pairs by Horizon – 03/28/2019, Production Test Facility

Attachment A – Box Diagrams for First Quarter Monitoring Data

Attachment B – Summary Plot of Bulk Electrical Conductivity

TABLES

TABLE 1
BULK ELECTRICAL CONDUCTIVITY MONITORING RESULTS
HORIZON 1 (40 FEET ABOVE LBFU/OXIDE CONTACT)
FLORENCE COPPER PROJECT
FLORENCE, ARIZONA

Electrode 1	Electrode 2	Sending Well	Receiving Well	Apparent Resistivity (Ω -m)												
				1/3/2019	1/11/2019	1/17/2019	1/24/2019	1/31/2019	2/8/2019	2/14/2019	2/21/2019	2/28/2019	3/6/2019	3/14/2019	3/21/2019	3/28/2019
B-01-BC-01	B-02-BC-01	O-01	O-02	13.02	12.89	12.92	12.93	12.93	12.91	12.89	12.92	12.85	12.85	12.83	12.85	12.87
B-01-BC-01	B-03-BC1-02	O-01	O-03	11.72	11.45	11.45	11.58	11.58	11.45	11.44	11.47	11.39	11.34	11.37	11.37	11.40
B-01-BC-01	B-04-BC-01	O-01	O-04	13.85	13.53	13.49	13.83	13.83	13.52	13.52	13.54	13.42	13.34	13.41	13.44	13.45
B-01-BC-01	B-05-BC-01	O-01	O-05	12.75	12.46	12.44	12.52	12.52	12.43	12.45	12.46	12.37	12.23	12.33	12.38	12.39
B-01-BC-01	B-06-BC-01	O-01	O-06	12.16	11.93	11.92	11.90	11.90	11.93	11.93	11.92	11.87	11.78	11.81	11.86	11.87
B-01-BC-01	B-07-BC1-02	O-01	O-07	12.06	11.89	11.88	11.84	11.84	11.90	11.90	11.90	11.86	11.82	11.83	11.85	11.86
B-02-BC-01	B-03-BC1-02	O-02	O-03	10.75	10.59	10.58	10.70	10.70	10.57	10.58	10.58	10.52	10.49	10.53	10.52	10.53
B-02-BC-01	B-04-BC-01	O-02	O-04	14.55	14.21	14.20	14.41	14.41	14.19	14.21	14.21	14.11	14.03	14.09	14.13	14.13
B-02-BC-01	B-05-BC-01	O-02	O-05	14.06	13.74	13.74	13.89	13.89	13.74	13.73	13.77	13.66	13.49	13.63	13.65	13.68
B-02-BC-01	B-06-BC-01	O-02	O-06	14.07	13.74	13.74	13.73	13.73	13.74	13.75	13.75	13.68	13.53	13.63	13.65	13.67
B-02-BC-01	B-07-BC1-02	O-02	O-07	12.82	12.57	12.57	12.71	12.71	12.58	12.58	12.58	12.53	12.46	12.47	12.50	12.52
B-03-BC1-02	B-04-BC-01	O-03	O-04	13.01	12.76	12.77	12.95	12.95	12.75	12.74	12.77	12.70	12.58	12.66	12.67	12.69
B-03-BC1-02	B-05-BC-01	O-03	O-05	13.49	13.21	13.19	13.20	13.20	13.19	13.19	13.21	13.13	12.96	13.08	13.11	13.12
B-03-BC1-02	B-06-BC-01	O-03	O-06	14.70	14.35	14.35	14.33	14.33	14.36	14.37	14.38	14.29	14.13	14.22	14.26	14.29
B-03-BC1-02	B-07-BC1-02	O-03	O-07	13.89	13.57	13.56	13.63	13.63	13.56	13.56	13.57	13.49	13.37	13.42	13.47	13.47
B-04-BC-01	B-05-BC-01	O-04	O-05	10.99	10.88	10.87	10.92	10.92	10.89	10.87	10.89	10.85	10.75	10.79	10.83	10.82
B-04-BC-01	B-06-BC-01	O-04	O-06	12.55	12.32	12.30	12.51	12.51	12.31	12.31	12.32	12.25	12.08	12.15	12.23	12.23
B-04-BC-01	B-07-BC1-02	O-04	O-07	13.26	12.98	12.94	13.00	13.00	12.97	12.97	12.98	12.89	12.75	12.81	12.86	12.90
B-05-BC-01	B-06-BC-01	O-05	O-06	10.28	10.12	10.12	10.07	10.07	10.13	10.12	10.13	10.08	9.91	9.97	10.05	10.06
B-05-BC-01	B-07-BC1-02	O-05	O-07	11.16	10.93	10.92	11.04	11.04	10.93	10.93	10.93	10.88	10.70	10.83	10.87	10.87
B-06-BC-01	B-07-BC1-02	O-06	O-07	10.20	10.09	10.10	10.19	10.19	10.10	10.11	10.10	10.07	10.01	10.05	10.06	10.07

Notes

Ω -m = ohm-meters

LBFU = lower basin-fill unit

Oxide = bedrock oxide unit

TABLE 2
BULK ELECTRICAL CONDUCTIVITY MONITORING RESULTS
HORIZON 2 (20 FEET ABOVE LBFU/OXIDE CONTACT)
FLORENCE COPPER PROJECT
FLORENCE, ARIZONA

Electrode 1	Electrode 2	Sending Well	Receiving Well	Apparent Resistivity (Ω-m)												
				1/3/2019	1/11/2019	1/17/2019	1/24/2019	1/31/2019	2/8/2019	2/14/2019	2/21/2019	2/28/2019	3/6/2019	3/14/2019	3/21/2019	3/28/2019
B-01-BC-02	B-02-BC-02	O-01	O-02	14.82	14.70	14.71	14.80	14.80	14.68	14.70	14.70	14.65	14.64	14.66	14.63	14.66
B-01-BC-02	B-03-BC1-04	O-01	O-03	11.79	11.53	11.53	11.58	11.58	11.51	11.53	11.53	11.45	11.43	11.46	11.46	11.48
B-01-BC-02	B-04-BC-02	O-01	O-04	13.71	13.38	13.40	13.23	13.23	13.38	13.38	13.40	13.29	13.20	13.31	13.29	13.33
B-01-BC-02	B-05-BC-02	O-01	O-05	12.57	12.29	12.27	12.52	12.52	12.28	12.29	12.28	12.19	12.07	12.17	12.21	12.24
B-01-BC-02	B-06-BC-02	O-01	O-06	12.01	11.79	11.78	11.91	11.91	11.78	11.78	11.79	11.72	11.63	11.66	11.71	11.73
B-01-BC-02	B-07-BC1-04	O-01	O-07	12.02	11.86	11.85	11.80	11.80	11.86	11.86	11.87	11.82	11.78	11.82	11.81	11.82
B-02-BC-02	B-03-BC1-04	O-02	O-03	11.45	11.27	11.26	11.26	11.26	11.24	11.25	11.26	11.20	11.16	11.21	11.19	11.20
B-02-BC-02	B-04-BC-02	O-02	O-04	14.62	14.27	14.26	14.41	14.41	14.27	14.26	14.27	14.17	14.07	14.15	14.17	14.20
B-02-BC-02	B-05-BC-02	O-02	O-05	14.07	13.76	13.75	13.89	13.89	13.75	13.77	13.77	13.66	13.53	13.60	13.69	13.71
B-02-BC-02	B-06-BC-02	O-02	O-06	14.09	13.76	13.75	13.74	13.74	13.76	13.77	13.78	13.68	13.56	13.65	13.69	13.70
B-02-BC-02	B-07-BC1-04	O-02	O-07	12.81	12.57	12.56	12.58	12.58	12.57	12.58	12.58	12.49	12.42	12.50	12.49	12.51
B-03-BC1-04	B-04-BC-02	O-03	O-04	13.00	12.74	12.74	12.95	12.95	12.73	12.74	12.75	12.68	12.58	12.66	12.65	12.66
B-03-BC1-04	B-05-BC-02	O-03	O-05	13.36	13.07	13.05	13.20	13.20	13.05	13.05	13.07	12.99	12.83	12.95	12.96	12.98
B-03-BC1-04	B-06-BC-02	O-03	O-06	14.55	14.21	14.22	14.33	14.33	14.22	14.23	14.23	14.13	14.00	14.11	14.11	14.13
B-03-BC1-04	B-07-BC1-04	O-03	O-07	13.63	13.31	13.31	13.60	13.60	13.30	13.30	13.32	13.23	13.13	13.16	13.23	13.23
B-04-BC-02	B-05-BC-02	O-04	O-05	11.34	11.23	11.23	11.30	11.30	11.24	11.22	11.24	11.20	11.12	11.13	11.17	11.19
B-04-BC-02	B-06-BC-02	O-04	O-06	12.55	12.30	12.30	12.51	12.51	12.30	12.29	12.30	12.24	12.07	12.12	12.21	12.22
B-04-BC-02	B-07-BC1-04	O-04	O-07	13.01	12.72	12.72	12.97	12.97	12.72	12.73	12.73	12.66	12.52	12.61	12.64	12.67
B-05-BC-02	B-06-BC-02	O-05	O-06	10.51	10.35	10.36	10.35	10.35	10.36	10.35	10.36	10.31	10.14	10.18	10.28	10.28
B-05-BC-02	B-07-BC1-04	O-05	O-07	10.98	10.76	10.76	11.01	11.01	10.76	10.75	10.75	10.71	10.53	10.59	10.70	10.70
B-06-BC-02	B-07-BC1-04	O-06	O-07	10.96	10.85	10.84	10.88	10.88	10.85	10.85	10.85	10.83	10.77	10.79	10.82	10.83

Notes

Ω-m = ohm-meters

LBFU = lower basin-fill unit

Oxide = bedrock oxide unit

TABLE 3
BULK ELECTRICAL CONDUCTIVITY MONITORING RESULTS
HORIZON 3 (AT LBFU/OXIDE CONTACT)
FLORENCE COPPER PROJECT
FLORENCE, ARIZONA

Electrode 1	Electrode 2	Sending Well	Receiving Well	Apparent Resistivity (Ω-m)												
				1/3/2019	1/11/2019	1/17/2019	1/24/2019	1/31/2019	2/8/2019	2/14/2019	2/21/2019	2/28/2019	3/6/2019	3/14/2019	3/21/2019	3/28/2019
B-01-BC-03	B-02-BC-03	O-01	O-02	15.71	15.59	15.60	15.53	15.71	15.55	15.58	15.56	15.52	15.52	15.56	15.50	15.52
B-01-BC-03	B-03-BC2-02	O-01	O-03	11.84	11.60	11.59	11.58	11.58	11.57	11.58	11.59	11.53	11.47	11.55	11.52	11.53
B-01-BC-03	B-04-BC-03	O-01	O-04	13.51	13.18	13.19	13.23	13.23	13.21	13.23	13.24	13.12	13.06	13.13	13.14	13.18
B-01-BC-03	B-05-BC-03	O-01	O-05	12.40	12.12	12.12	12.52	11.95	12.14	12.13	12.15	12.04	11.94	12.02	12.07	12.10
B-01-BC-03	B-06-BC-03	O-01	O-06	11.86	11.61	11.62	11.91	11.91	11.61	11.61	11.61	11.54	11.46	11.51	11.54	11.57
B-01-BC-03	B-07-BC2-02	O-01	O-07	12.26	12.11	12.10	12.09	12.09	12.10	12.09	12.10	12.05	12.01	12.06	12.05	12.06
B-02-BC-03	B-03-BC2-02	O-02	O-03	11.81	11.63	11.64	11.57	11.57	11.64	11.60	11.61	11.55	11.53	11.58	11.55	11.57
B-02-BC-03	B-04-BC-03	O-02	O-04	14.39	14.06	14.05	14.41	14.41	14.06	14.05	14.09	13.96	13.87	13.97	13.99	13.99
B-02-BC-03	B-05-BC-03	O-02	O-05	13.87	13.54	13.53	13.90	13.90	13.54	13.55	13.58	13.45	13.32	13.43	13.47	13.50
B-02-BC-03	B-06-BC-03	O-02	O-06	13.92	13.59	13.59	13.75	13.75	13.58	13.60	13.62	13.51	13.39	13.47	13.51	13.53
B-02-BC-03	B-07-BC2-02	O-02	O-07	12.88	12.63	12.61	12.59	12.59	12.62	12.62	12.62	12.55	12.51	12.55	12.55	12.58
B-03-BC2-02	B-04-BC-03	O-03	O-04	12.92	12.68	12.65	12.95	12.95	12.64	12.64	12.68	12.59	12.51	12.58	12.58	12.59
B-03-BC2-02	B-05-BC-03	O-03	O-05	13.30	13.03	13.01	13.20	13.20	12.98	13.02	13.03	12.94	12.79	12.87	12.93	12.94
B-03-BC2-02	B-06-BC-03	O-03	O-06	14.58	14.22	14.20	14.33	14.33	14.20	14.23	14.25	14.13	13.99	14.10	14.12	14.14
B-03-BC2-02	B-07-BC2-02	O-03	O-07	13.57	13.27	13.24	13.60	13.60	13.23	13.25	13.27	13.20	13.06	13.14	13.18	13.19
B-04-BC-03	B-05-BC-03	O-04	O-05	12.08	11.97	11.97	12.07	12.07	11.95	11.95	11.95	11.93	11.84	11.86	11.92	11.90
B-04-BC-03	B-06-BC-03	O-04	O-06	12.64	12.41	12.40	12.51	12.51	12.39	12.38	12.39	12.33	12.16	12.23	12.30	12.30
B-04-BC-03	B-07-BC2-02	O-04	O-07	12.86	12.56	12.55	12.43	12.43	12.55	12.58	12.59	12.49	12.35	12.45	12.49	12.52
B-05-BC-03	B-06-BC-03	O-05	O-06	10.78	10.63	10.63	10.62	10.62	10.64	10.62	10.62	10.58	10.42	10.49	10.54	10.56
B-05-BC-03	B-07-BC2-02	O-05	O-07	10.83	10.61	10.60	10.59	10.59	10.62	10.60	10.59	10.55	10.42	10.47	10.54	10.56
B-06-BC-03	B-07-BC2-02	O-06	O-07	11.16	11.06	11.06	11.06	11.06	11.06	11.06	11.05	11.03	10.97	10.97	11.02	11.04

Notes

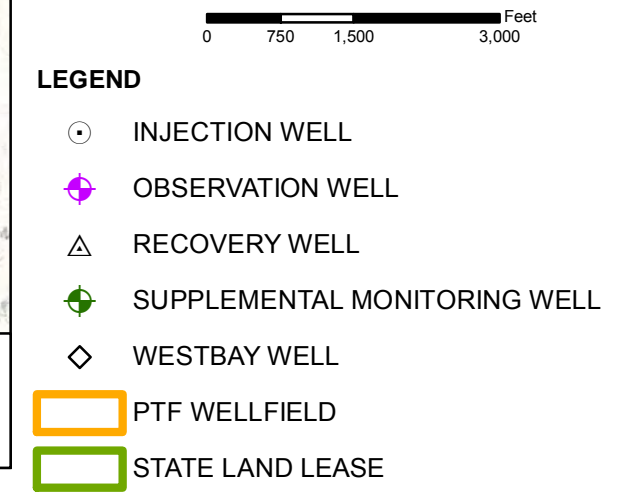
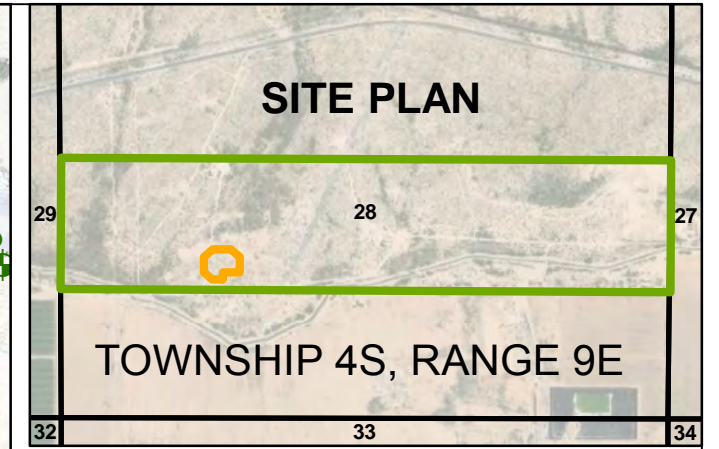
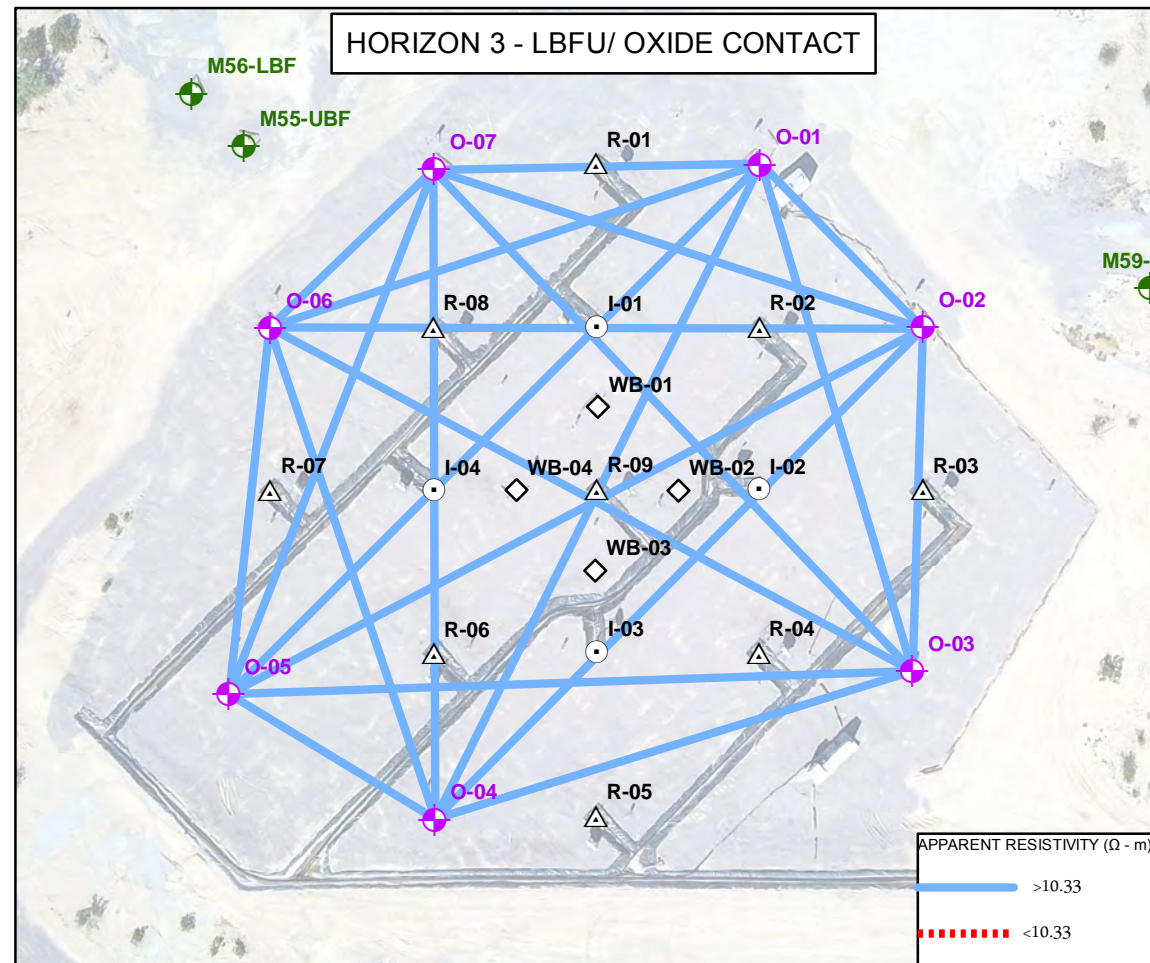
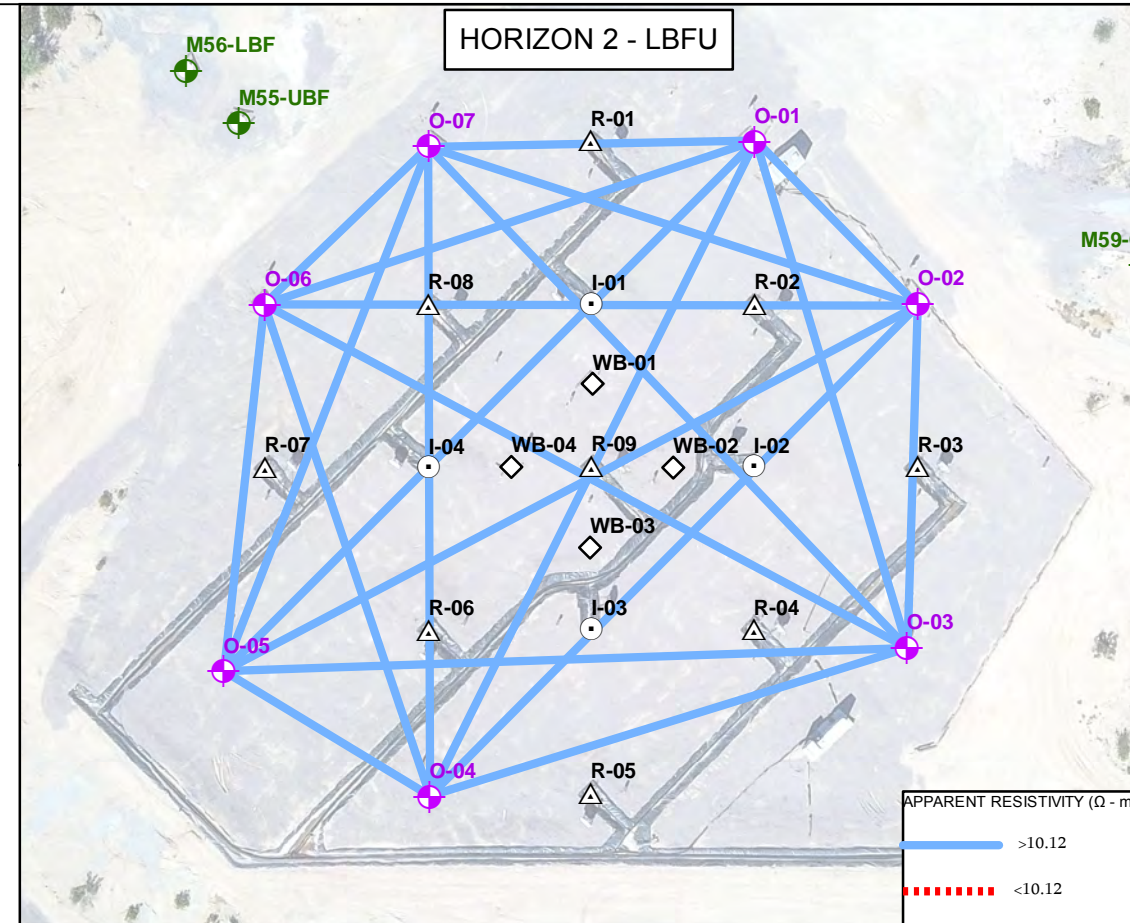
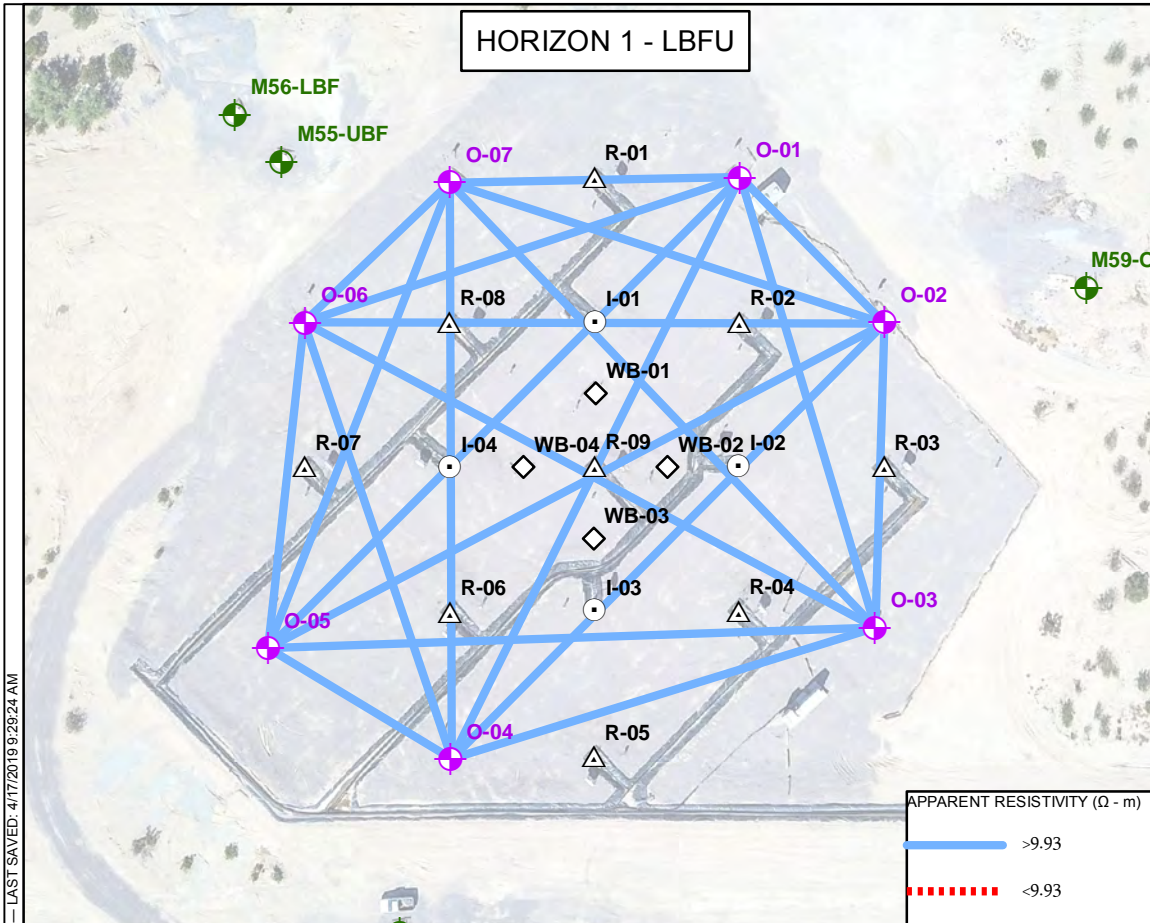
Ω-m = ohm-meters

LBFU = lower basin-fill unit

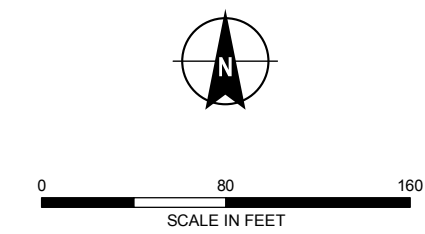
Oxide = bedrock oxide unit

FIGURES

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- ### NOTES
- ALL LOCATIONS AND DIMENSIONS APPROXIMATE
 - ($\Omega \cdot m$) = OHM - METERS
 - AERIAL IMAGERY SOURCE: FLORENCE COPPER INC., OCTOBER 2018



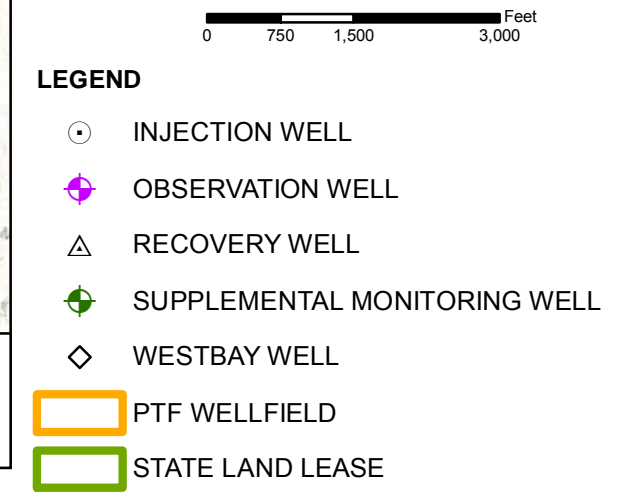
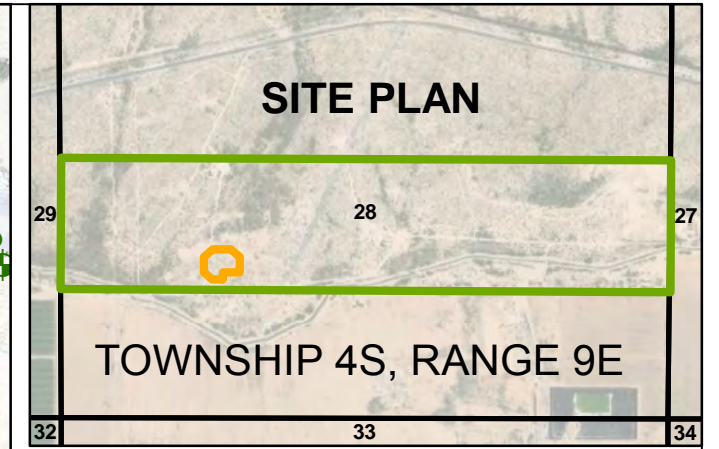
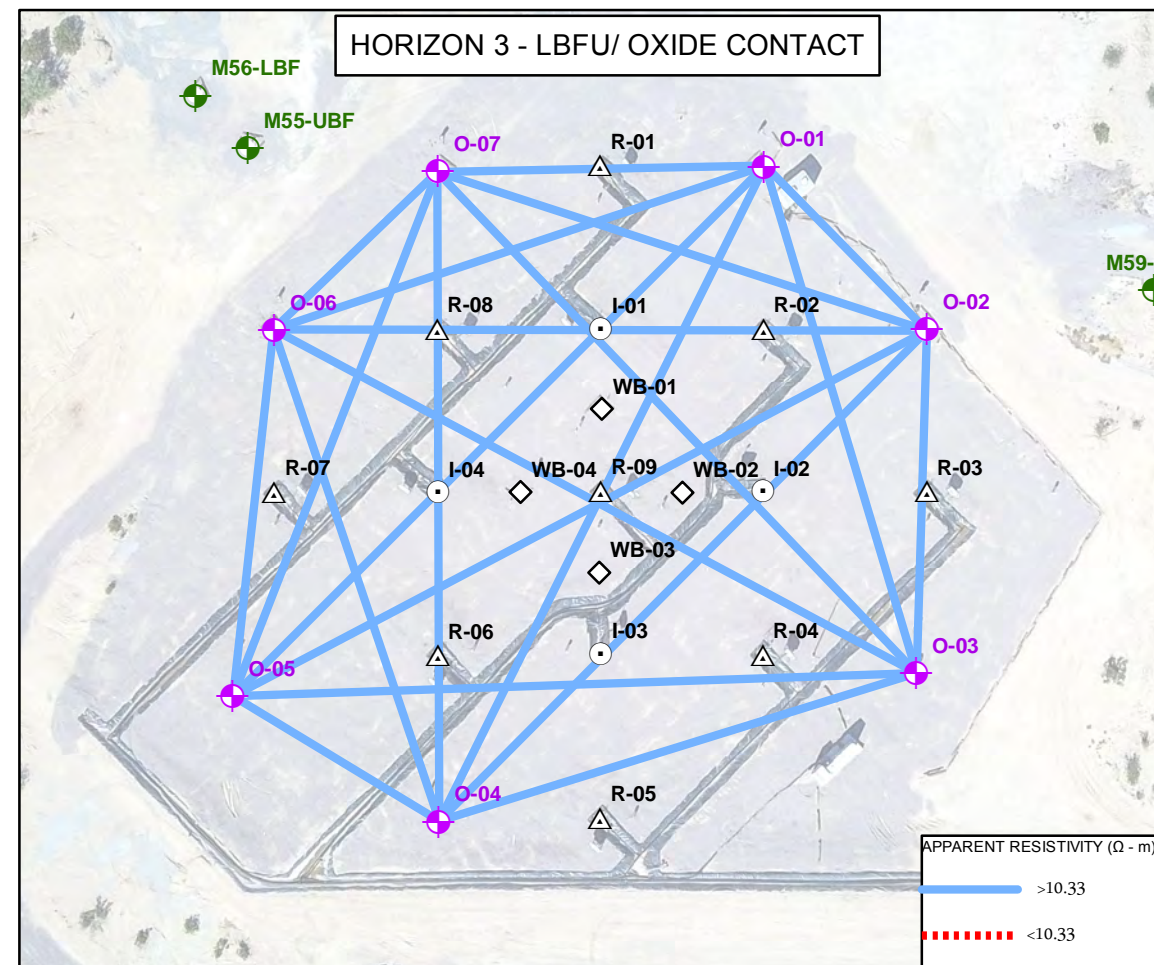
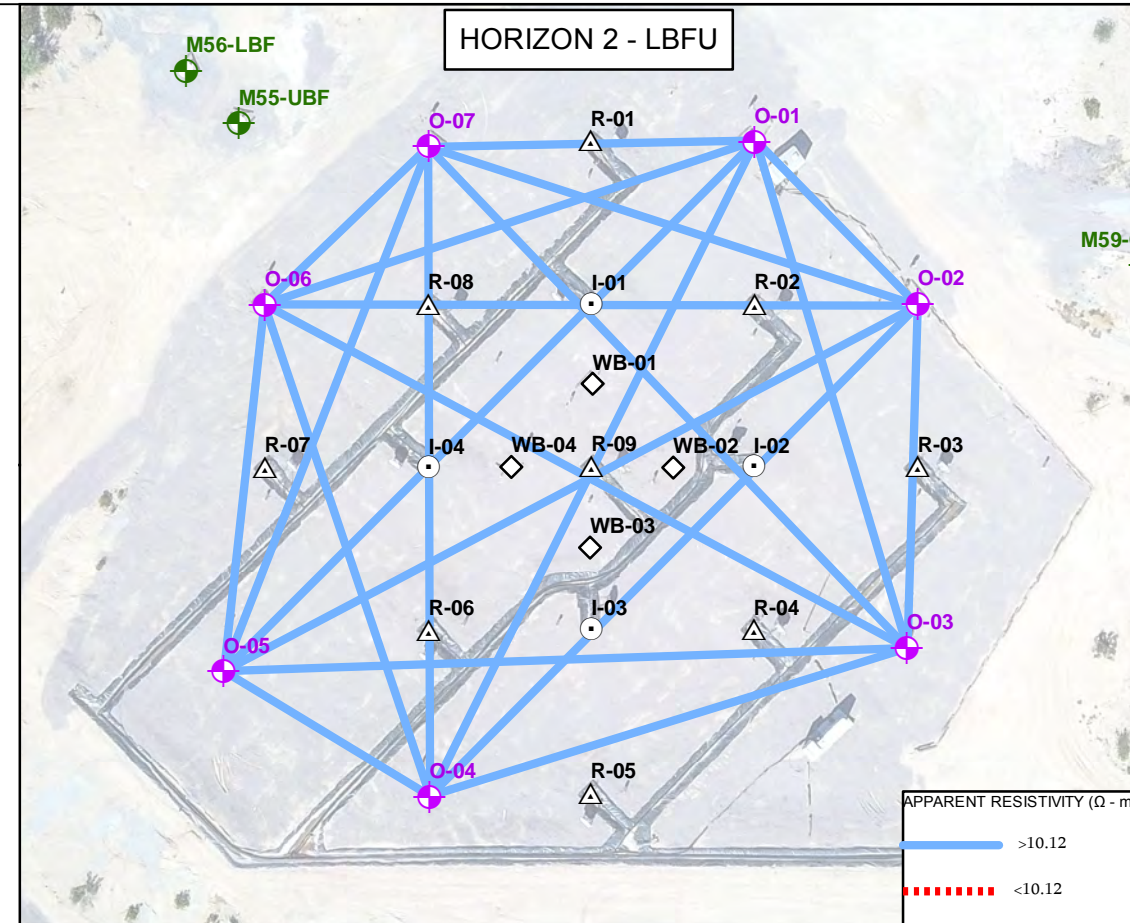
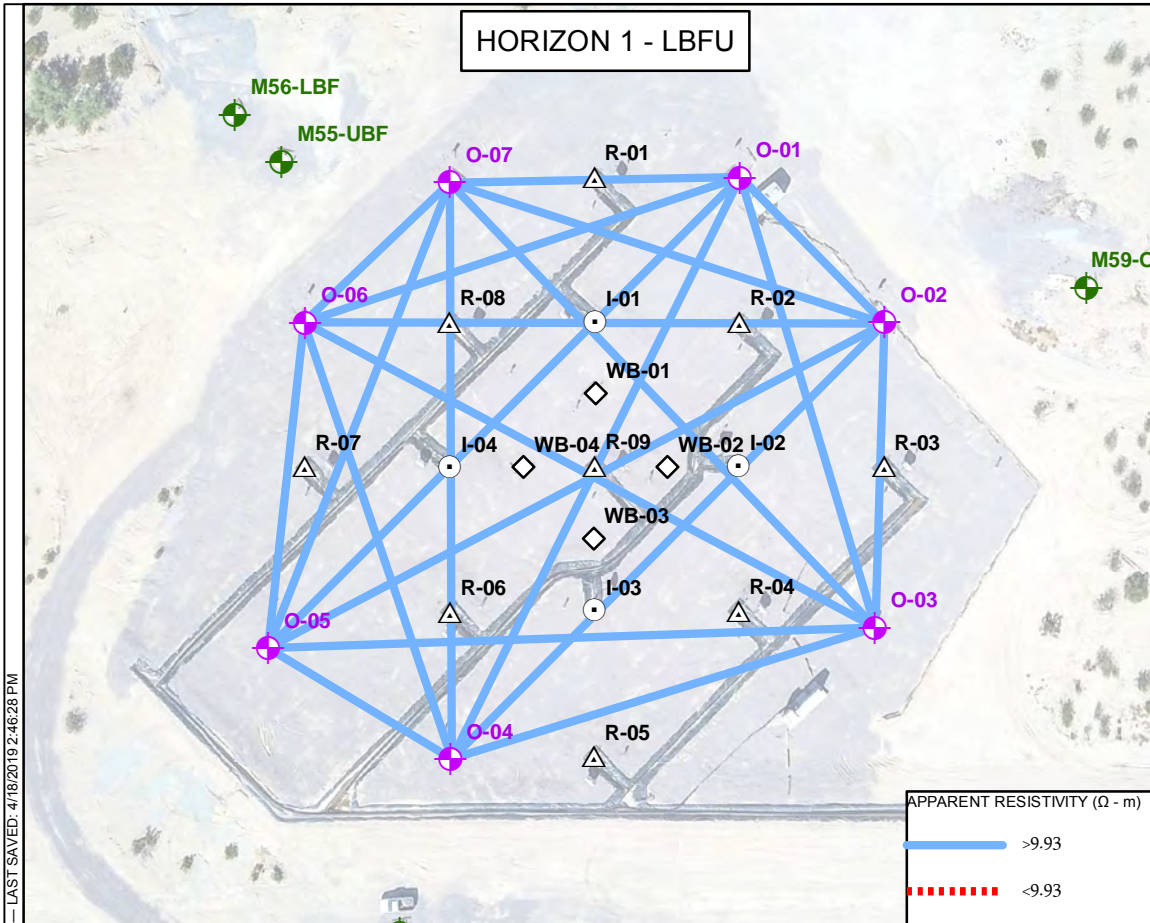
FLORENCE COPPER, INC.
FLORENCE, ARIZONA

BASELINE APPARENT RESISTIVITY
OF ELECTRODE PAIRS BY
HORIZON- 1/3/2019
PRODUCTION TEST FACILITY

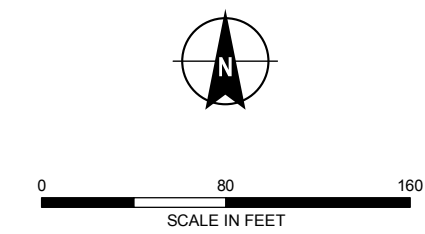
APRIL 2019

FIGURE 1

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- #### NOTES
- ALL LOCATIONS AND DIMENSIONS APPROXIMATE
 - ($\Omega \cdot m$) = OHM - METERS
 - AERIAL IMAGERY SOURCE: FLORENCE COPPER INC., OCTOBER 2018



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

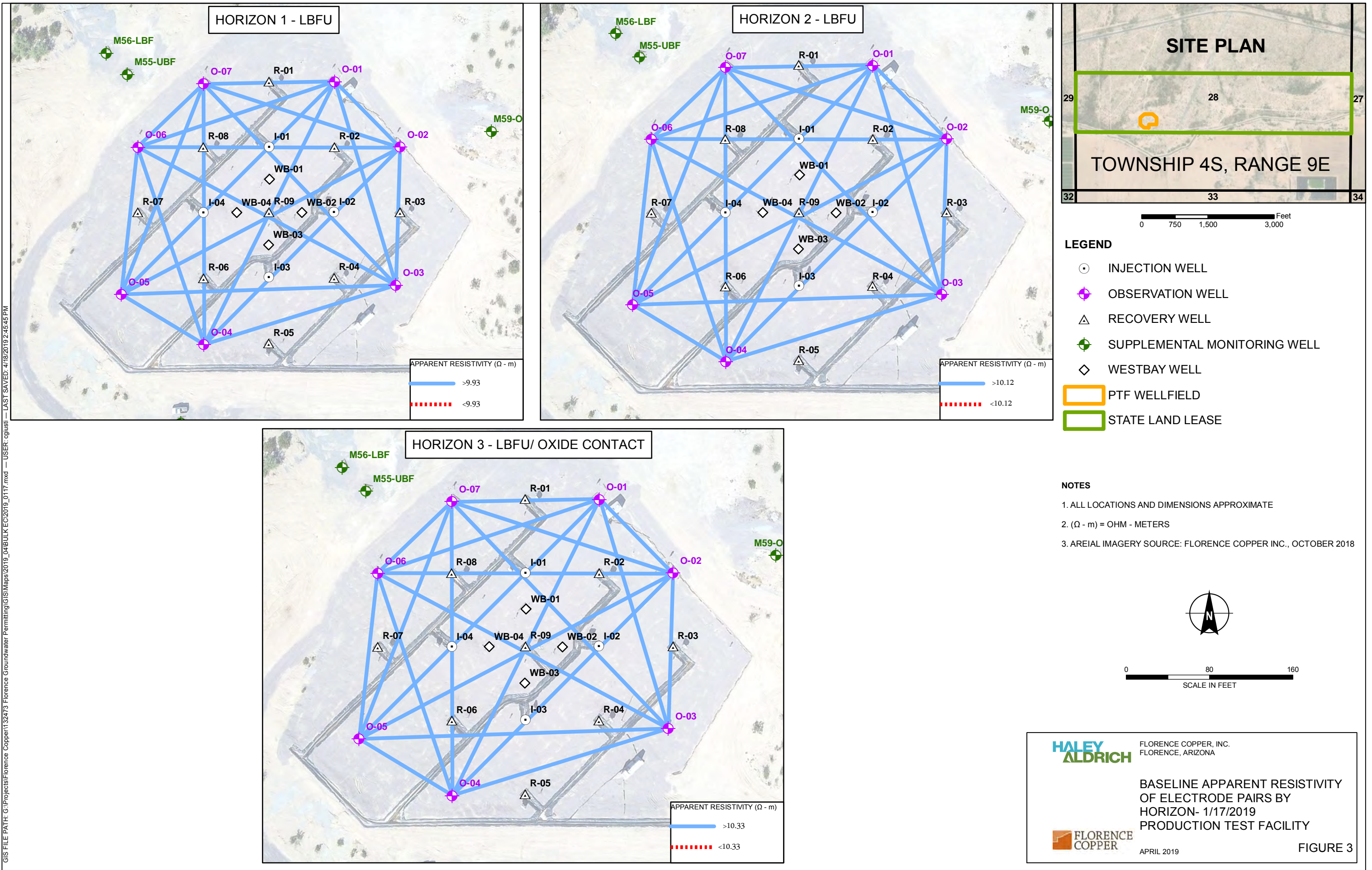
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OF ELECTRODE PAIRS BY
HORIZON- 1/11/2019
PRODUCTION TEST FACILITY

FLORENCE COPPER

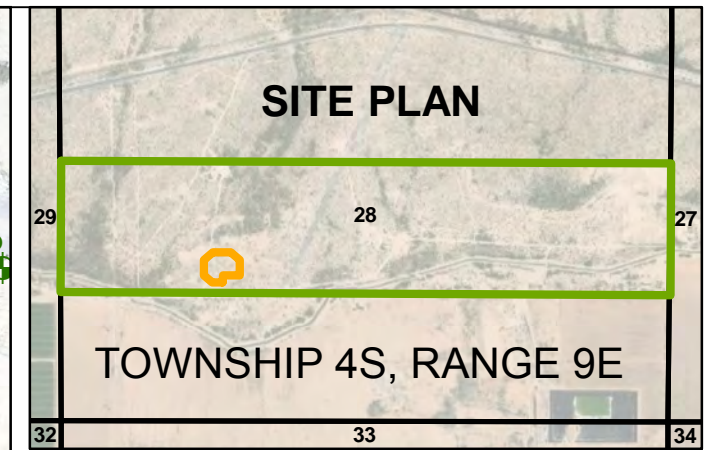
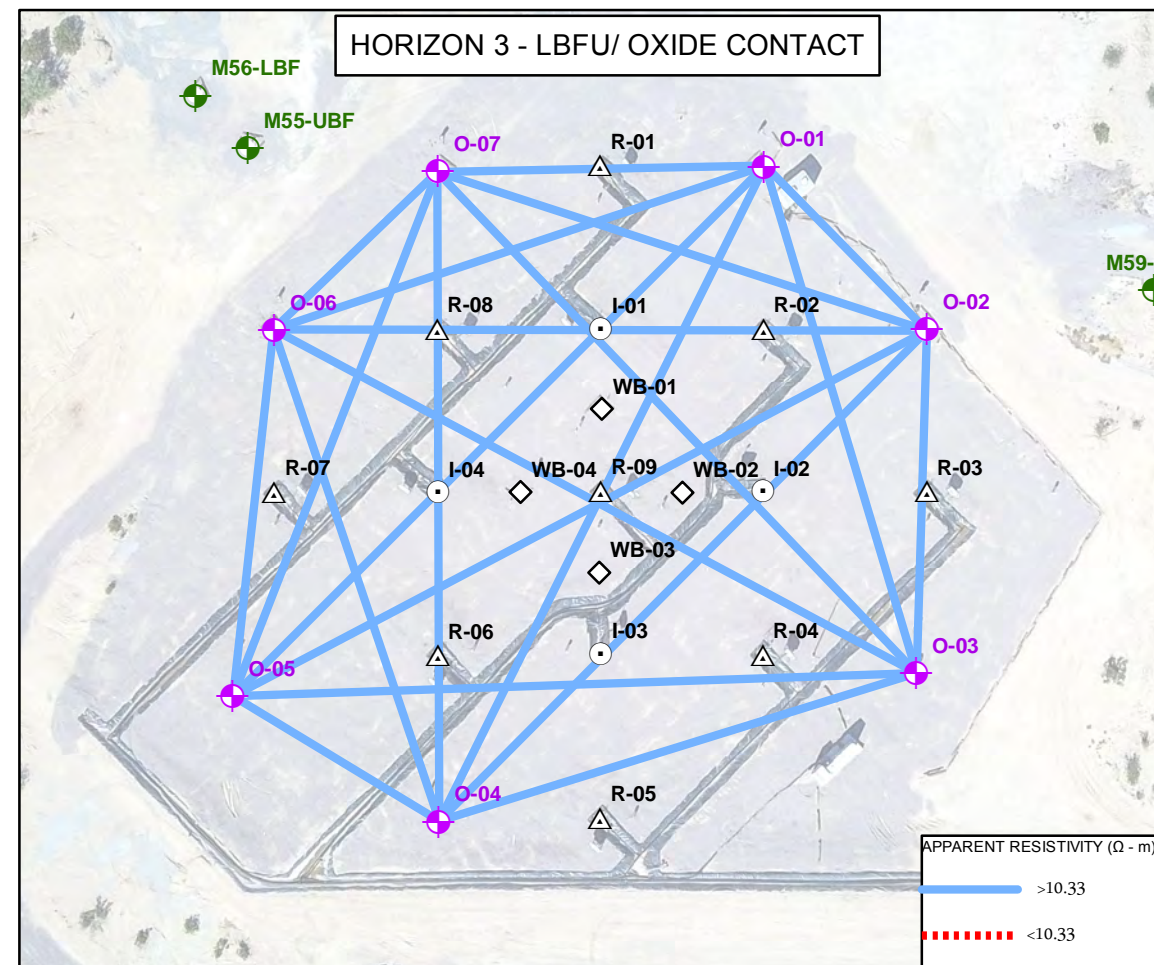
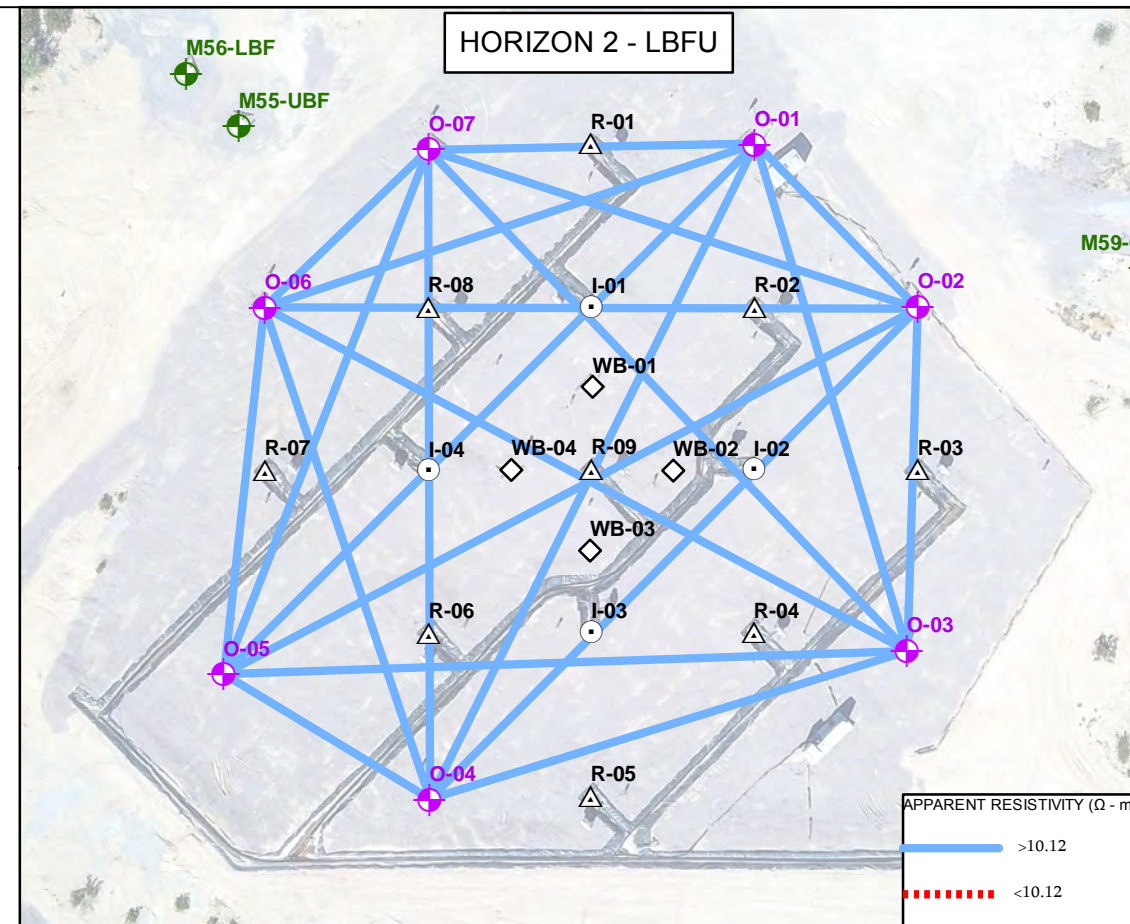
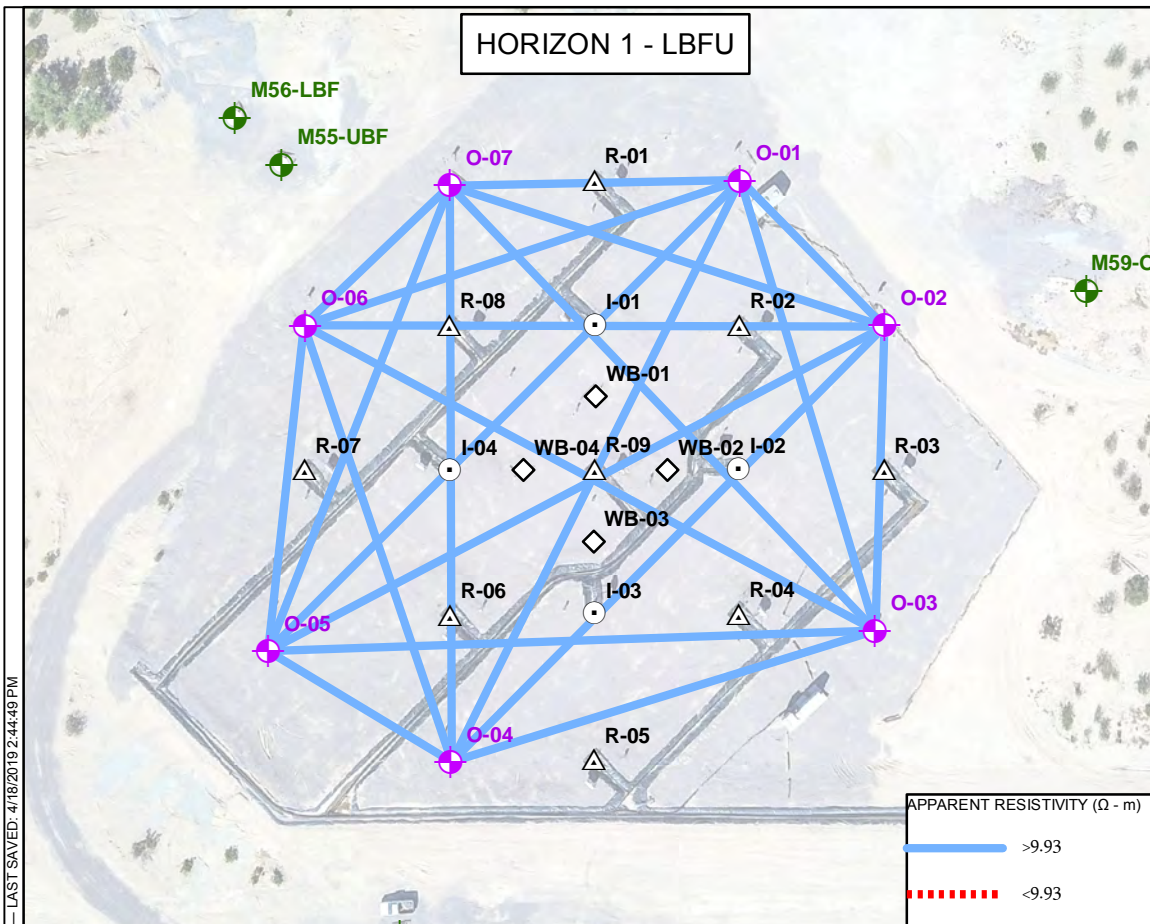
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FIGURE 2

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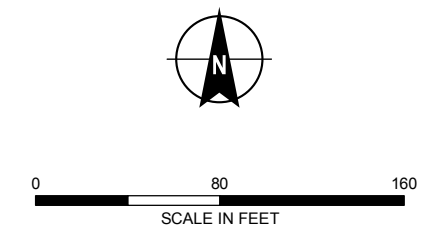


LEGEND

- INJECTION WELL
- OBSERVATION WELL
- RECOVERY WELL
- SUPPLEMENTAL MONITORING WELL
- WESTBAY WELL
- PTF WELLFIELD
- STATE LAND LEASE

NOTES

- ALL LOCATIONS AND DIMENSIONS APPROXIMATE
- $(\Omega \cdot m)$ = OHM - METERS
- AERIAL IMAGERY SOURCE: FLORENCE COPPER INC., OCTOBER 2018



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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

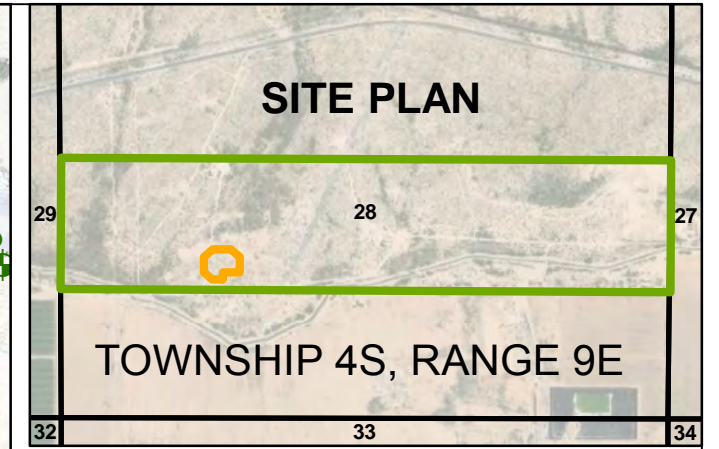
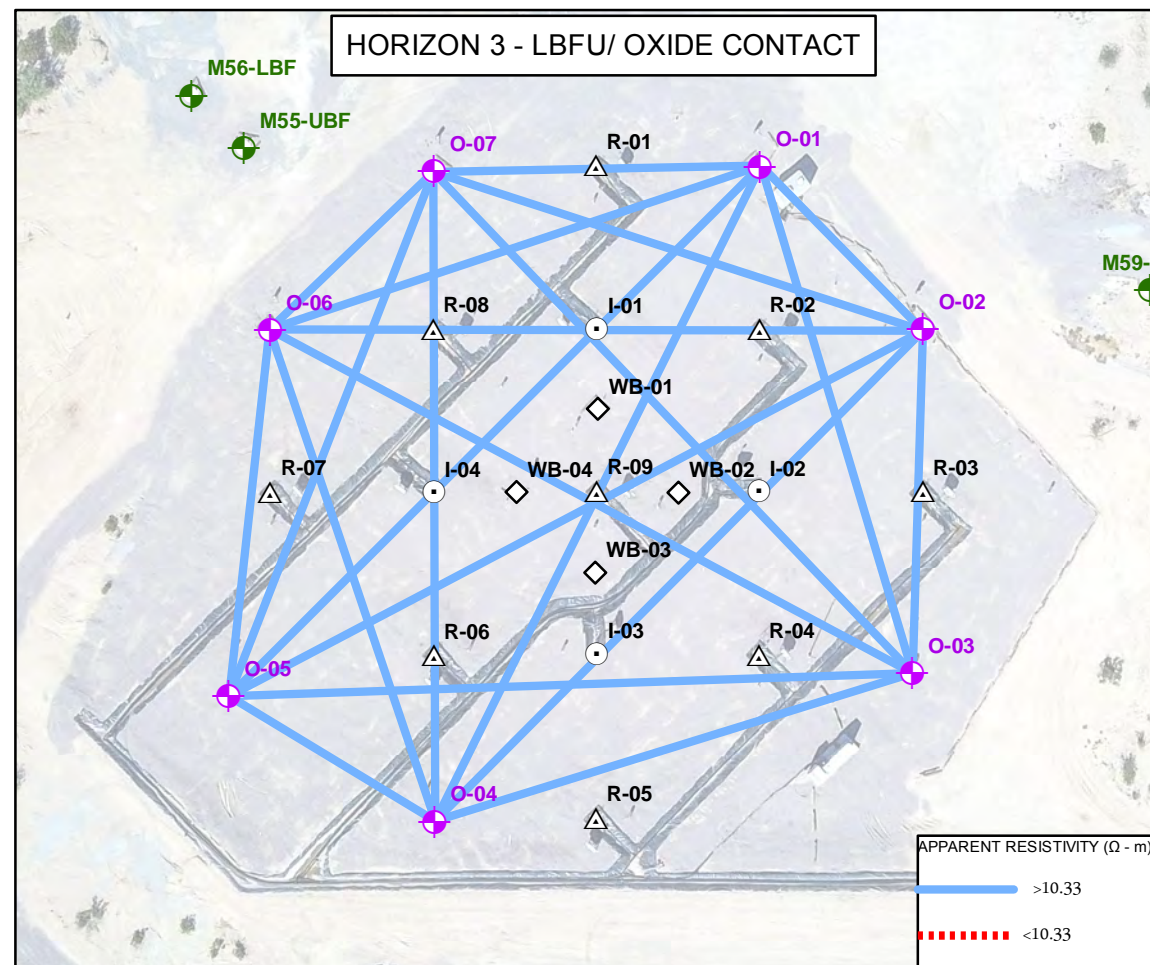
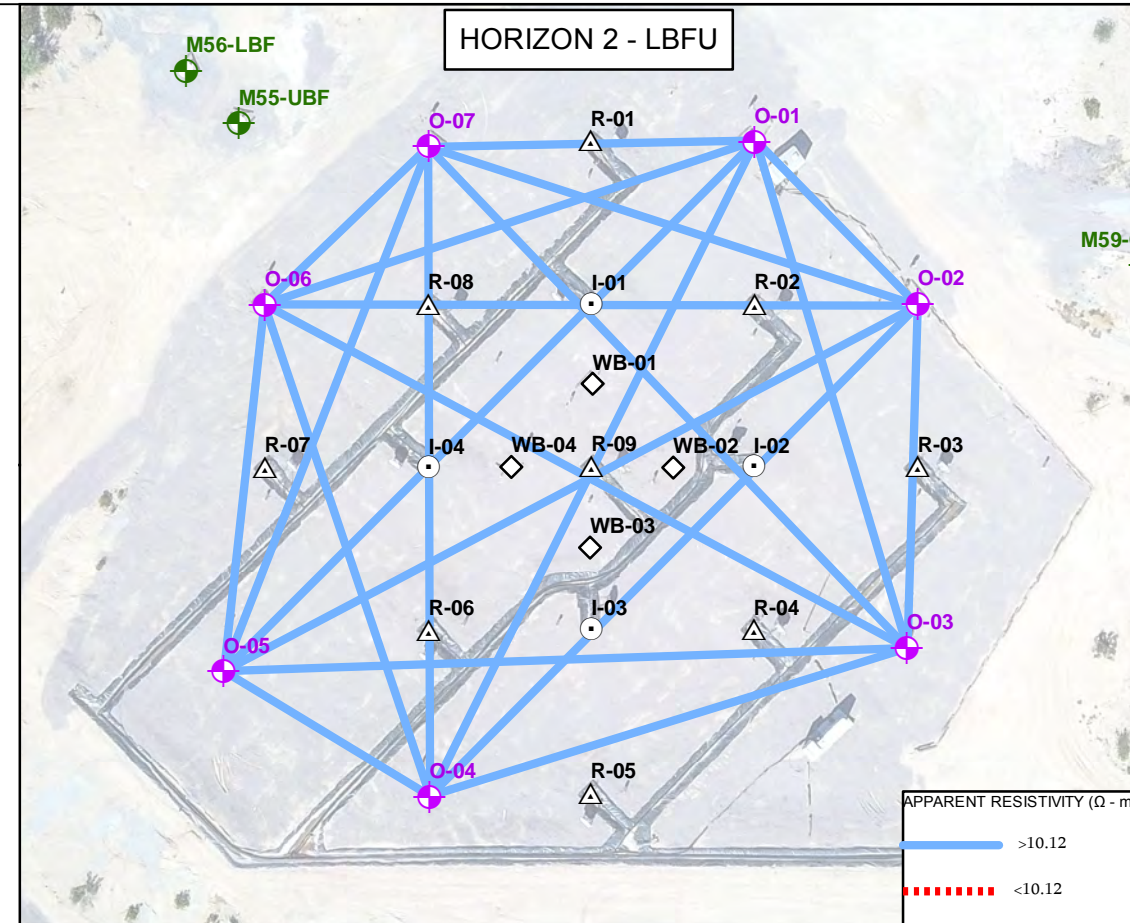
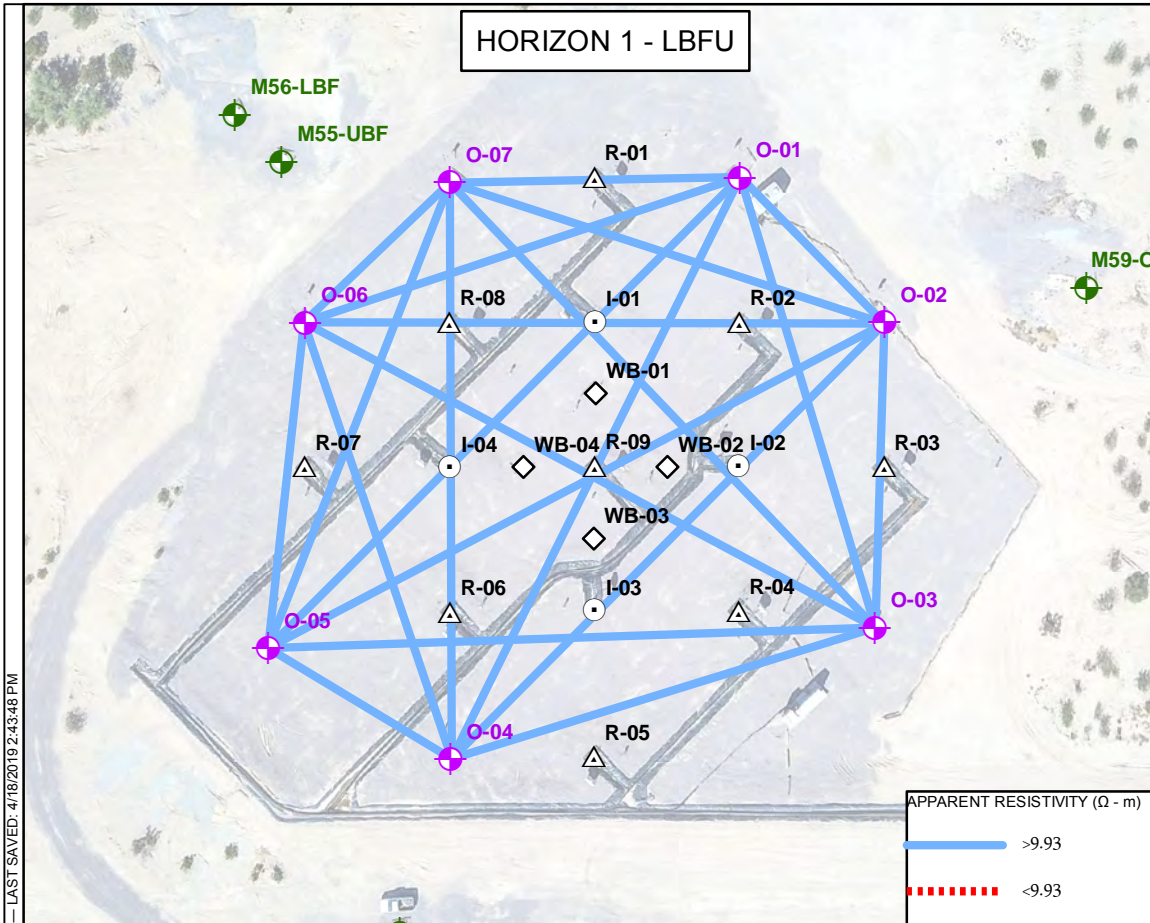
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BASELINE APPARENT RESISTIVITY
OF ELECTRODE PAIRS BY
HORIZON- 1/24/2019
PRODUCTION TEST FACILITY

APRIL 2019

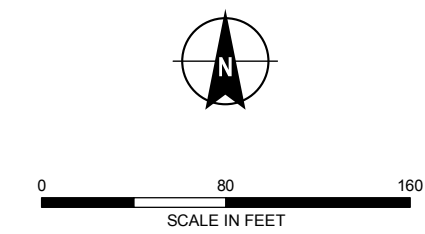
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- #### LEGEND
- INJECTION WELL
 - OBSERVATION WELL
 - RECOVERY WELL
 - SUPPLEMENTAL MONITORING WELL
 - WESTBAY WELL
 - PTF WELLFIELD
 - STATE LAND LEASE

- #### NOTES
- ALL LOCATIONS AND DIMENSIONS APPROXIMATE
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 - AREIAL IMAGERY SOURCE: FLORENCE COPPER INC., OCTOBER 2018



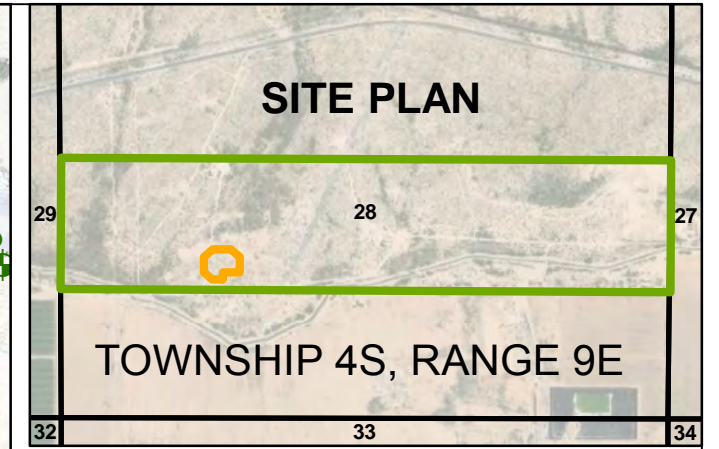
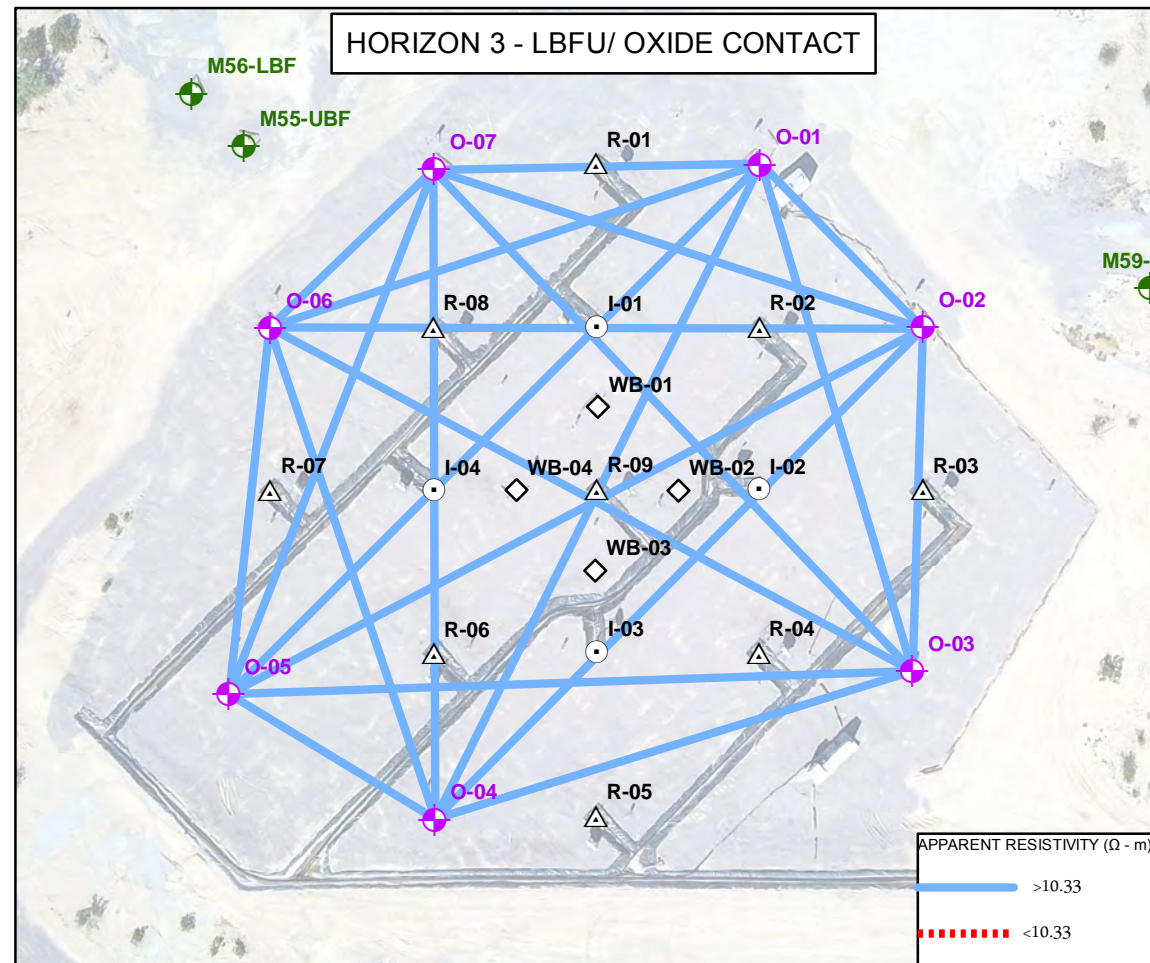
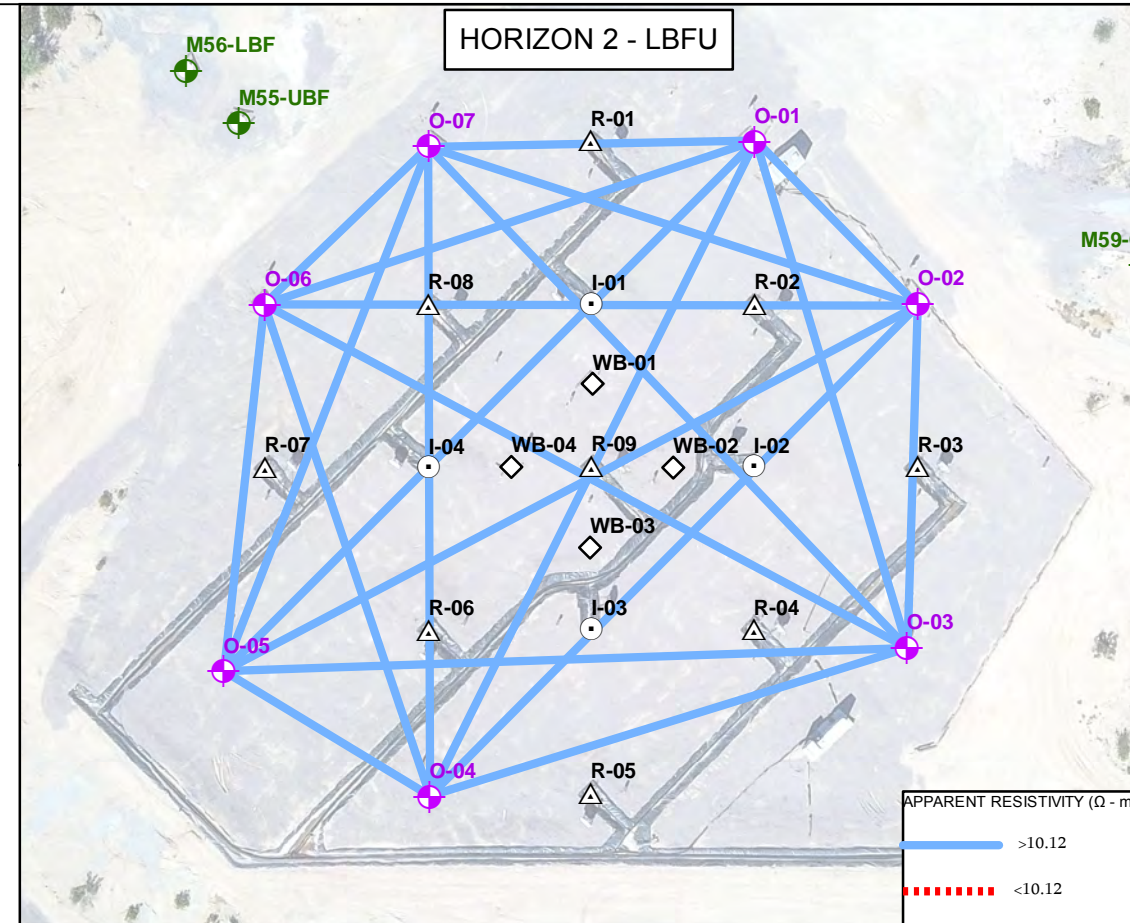
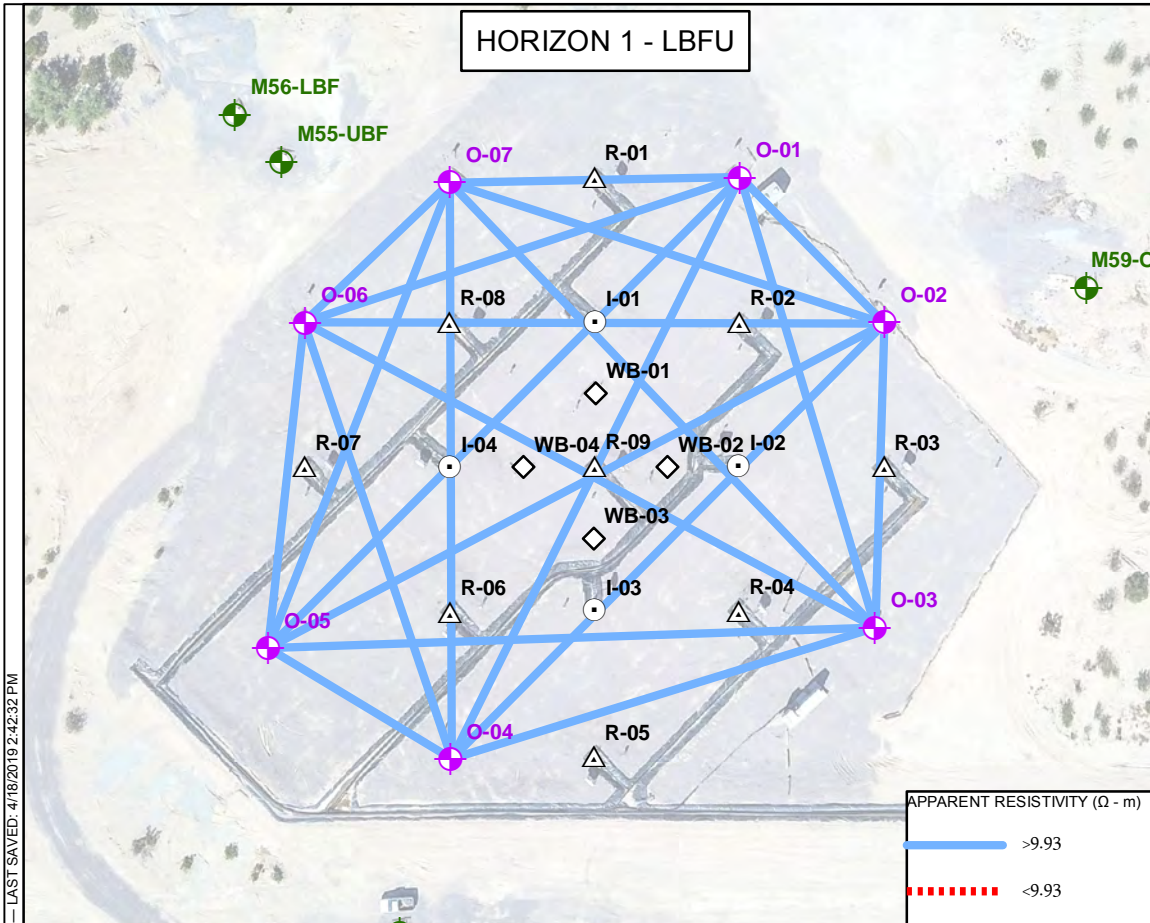
FLORENCE COPPER, INC.
FLORENCE, ARIZONA

BASELINE APPARENT RESISTIVITY
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PRODUCTION TEST FACILITY

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FIGURE 5

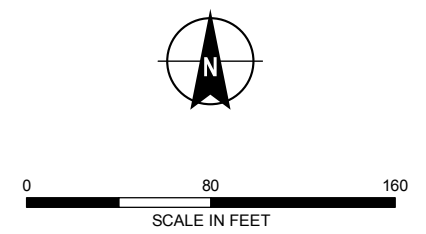
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LEGEND

- INJECTION WELL
- OBSERVATION WELL
- RECOVERY WELL
- SUPPLEMENTAL MONITORING WELL
- WESTBAY WELL
- PTF WELLFIELD
- STATE LAND LEASE

- NOTES**
- ALL LOCATIONS AND DIMENSIONS APPROXIMATE
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 - AERIAL IMAGERY SOURCE: FLORENCE COPPER INC., OCTOBER 2018



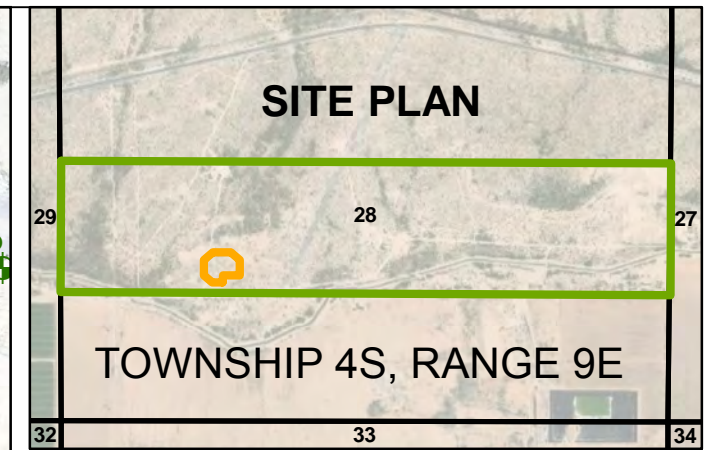
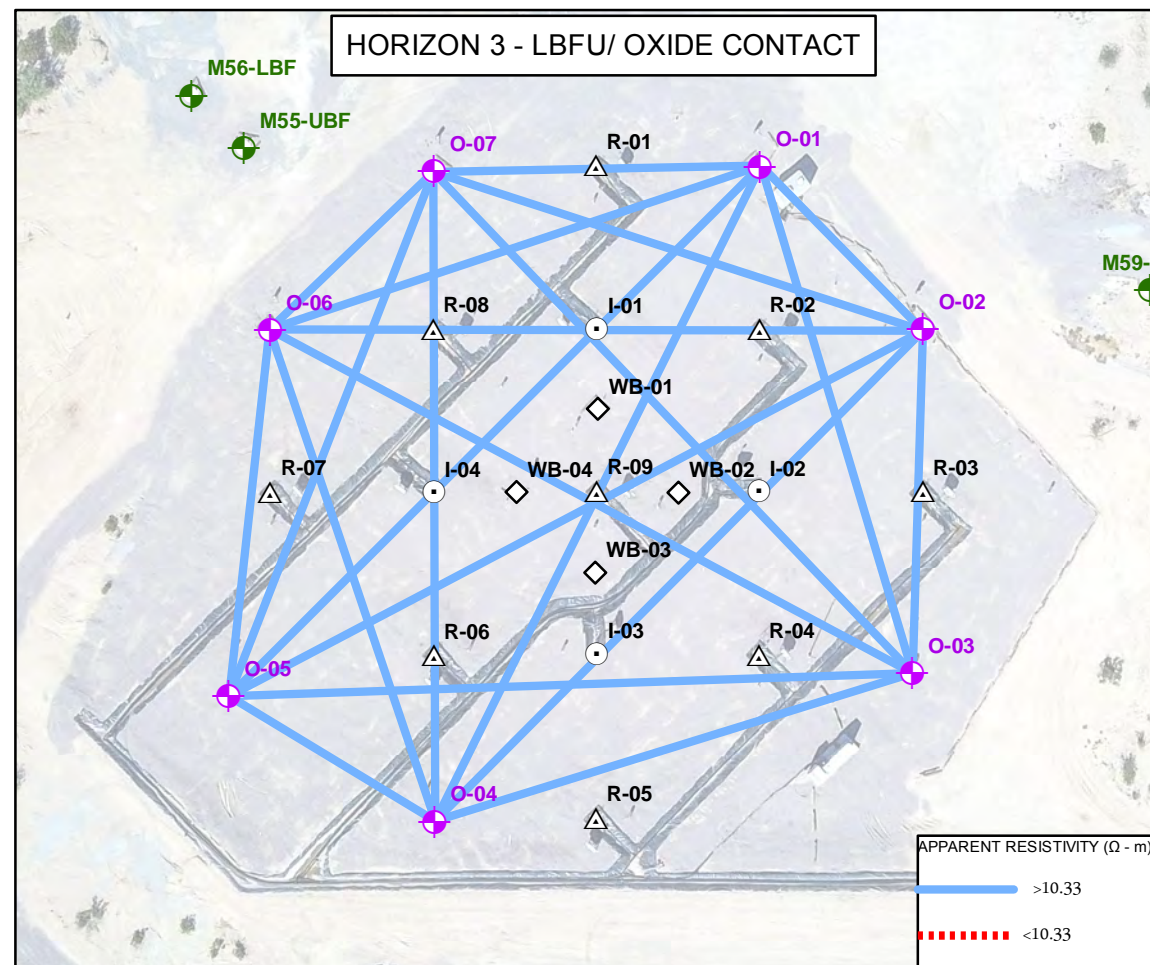
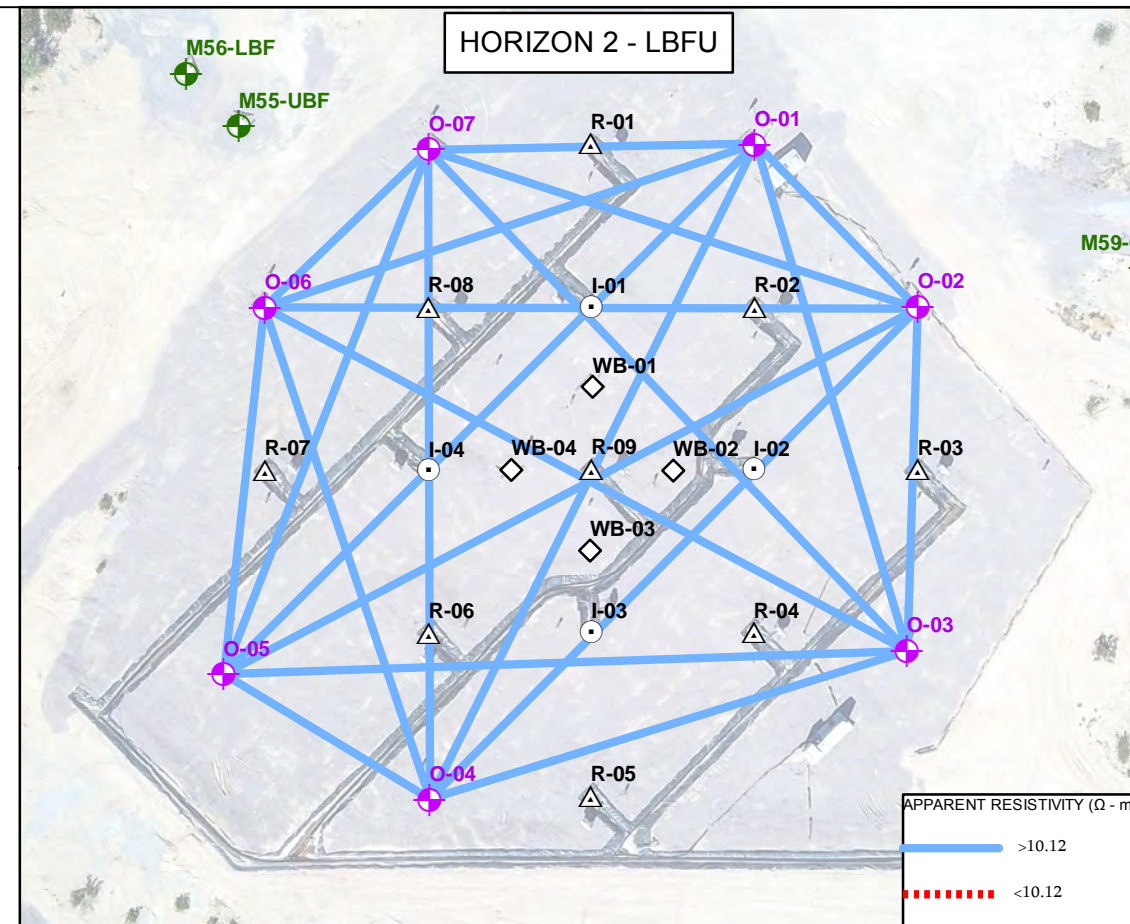
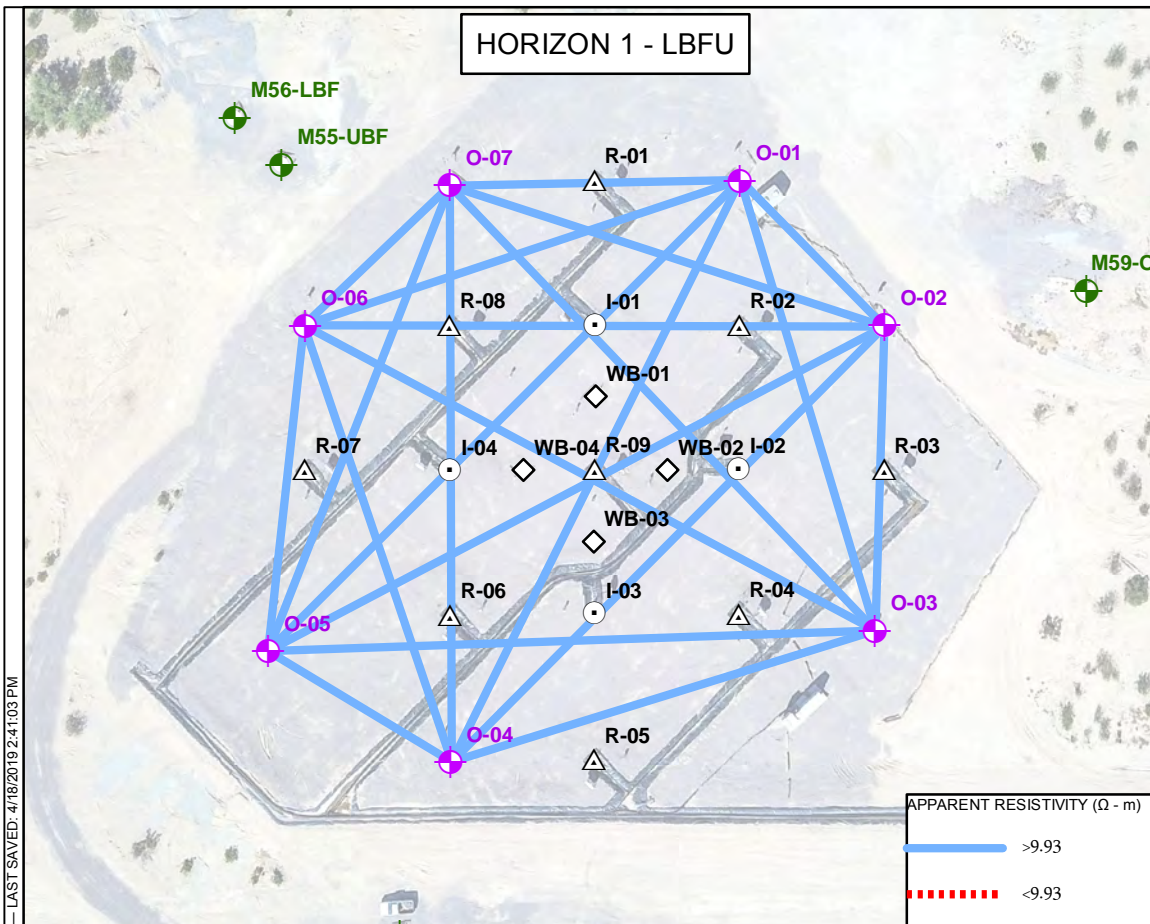
FLORENCE COPPER, INC.
FLORENCE, ARIZONA

BASELINE APPARENT RESISTIVITY
OF ELECTRODE PAIRS BY
HORIZON- 2/8/2019
PRODUCTION TEST FACILITY

APRIL 2019

FIGURE 6

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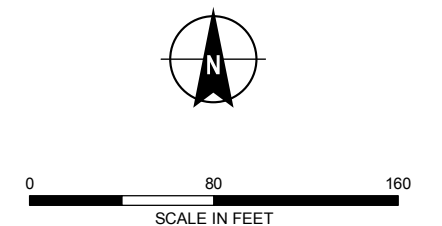


LEGEND

- INJECTION WELL
- OBSERVATION WELL
- RECOVERY WELL
- SUPPLEMENTAL MONITORING WELL
- WESTBAY WELL
- PTF WELLFIELD
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NOTES

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- AERIAL IMAGERY SOURCE: FLORENCE COPPER INC., OCTOBER 2018



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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

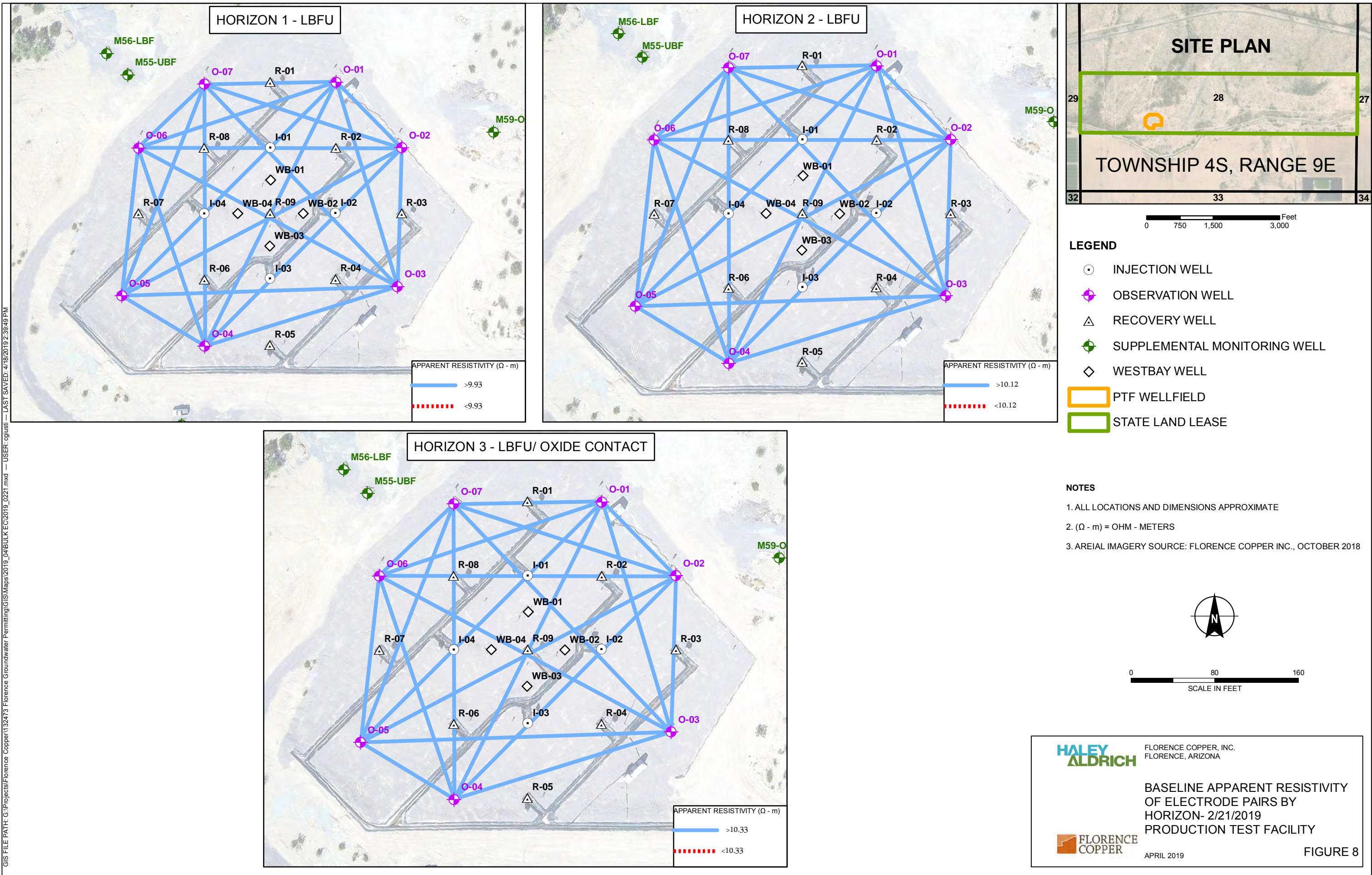
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HORIZON- 2/14/2019
PRODUCTION TEST FACILITY

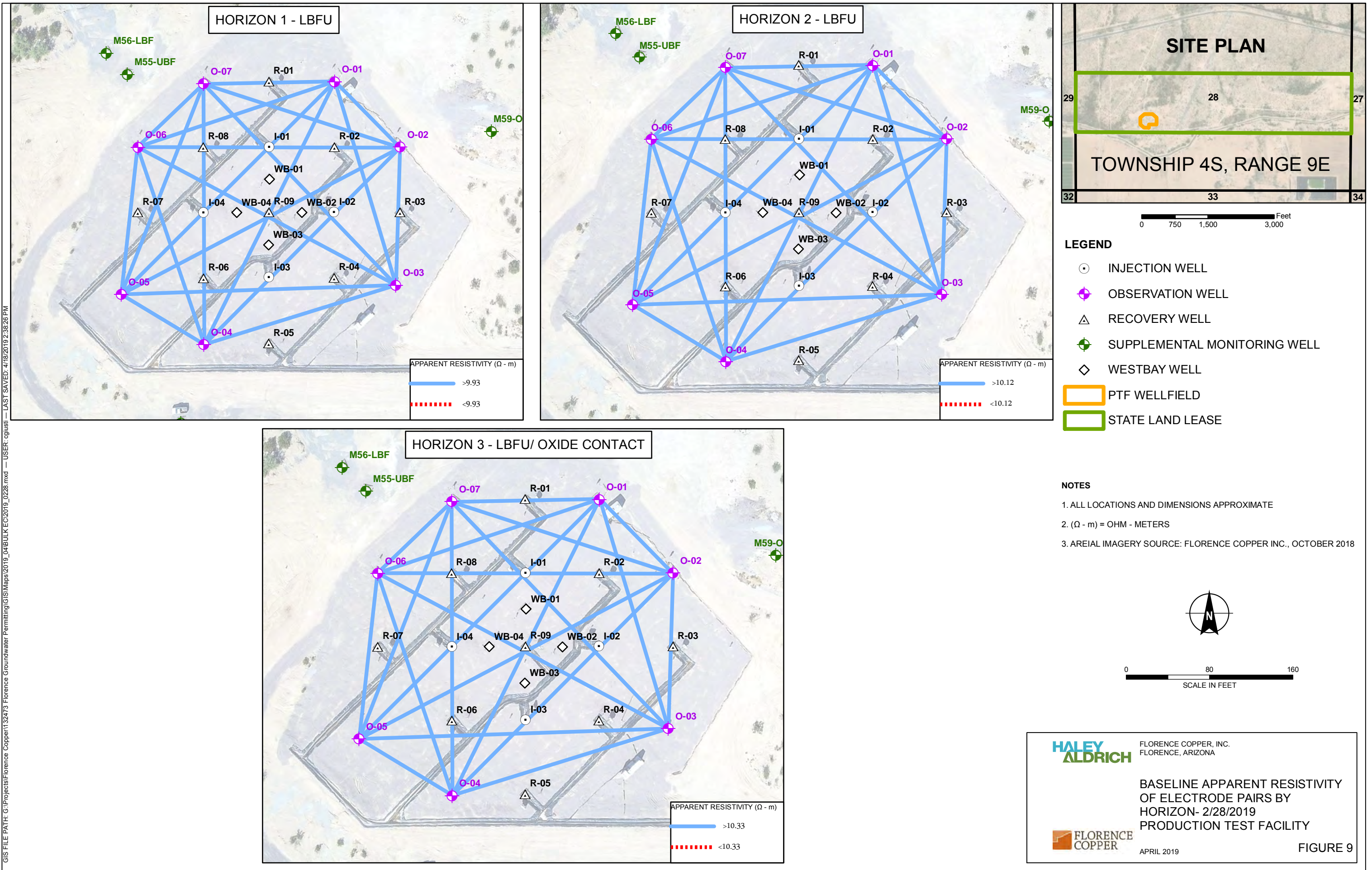
APRIL 2019

FIGURE 7

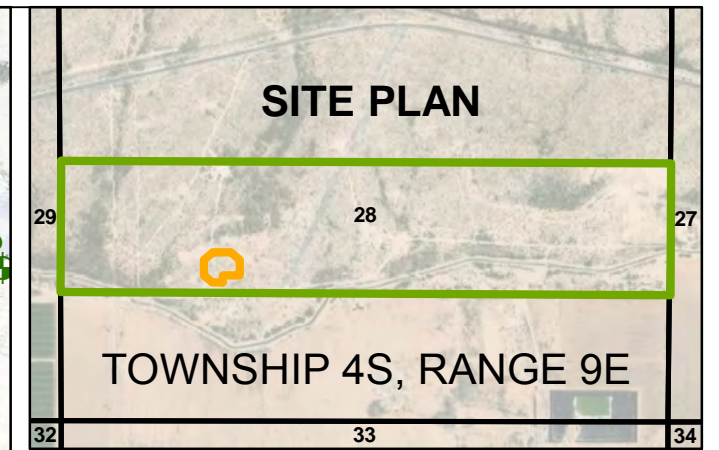
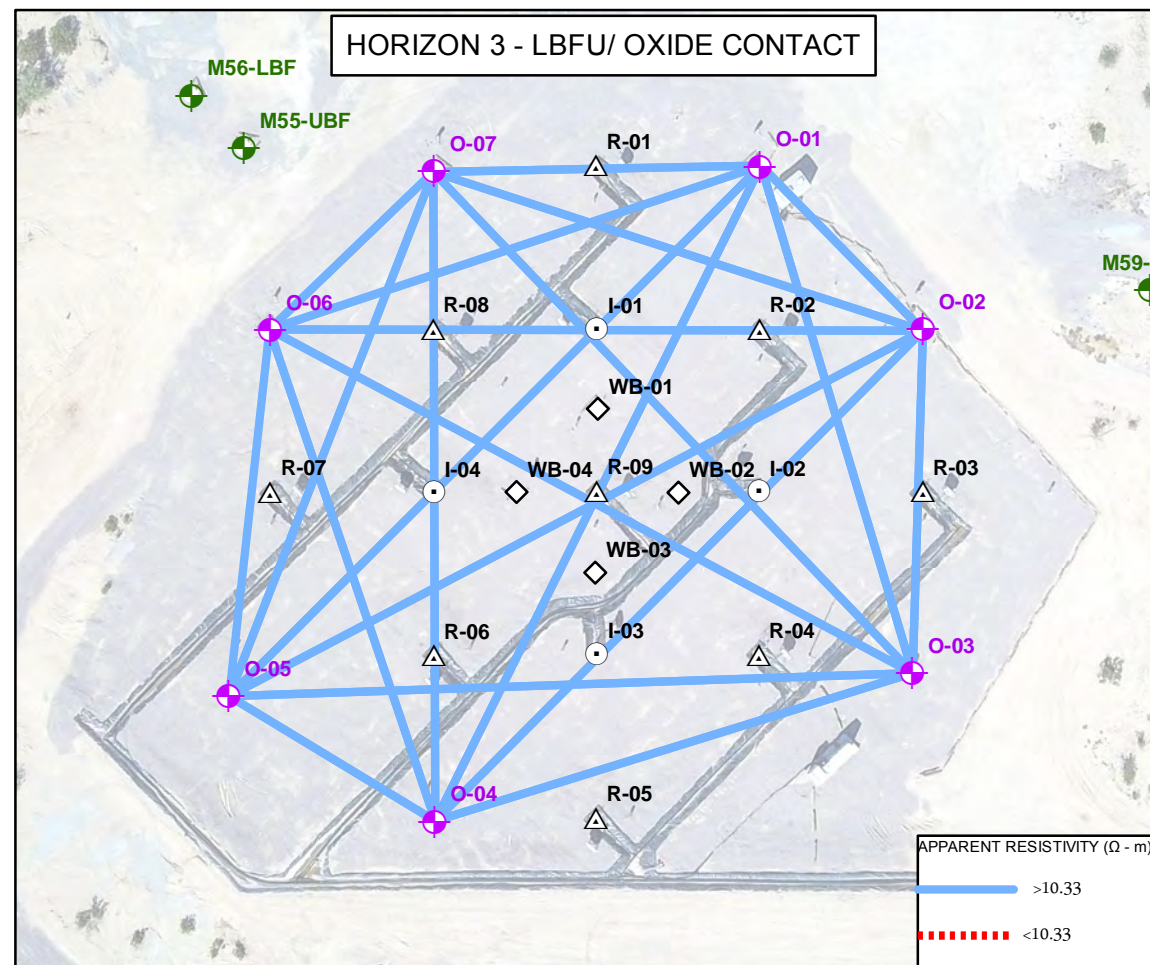
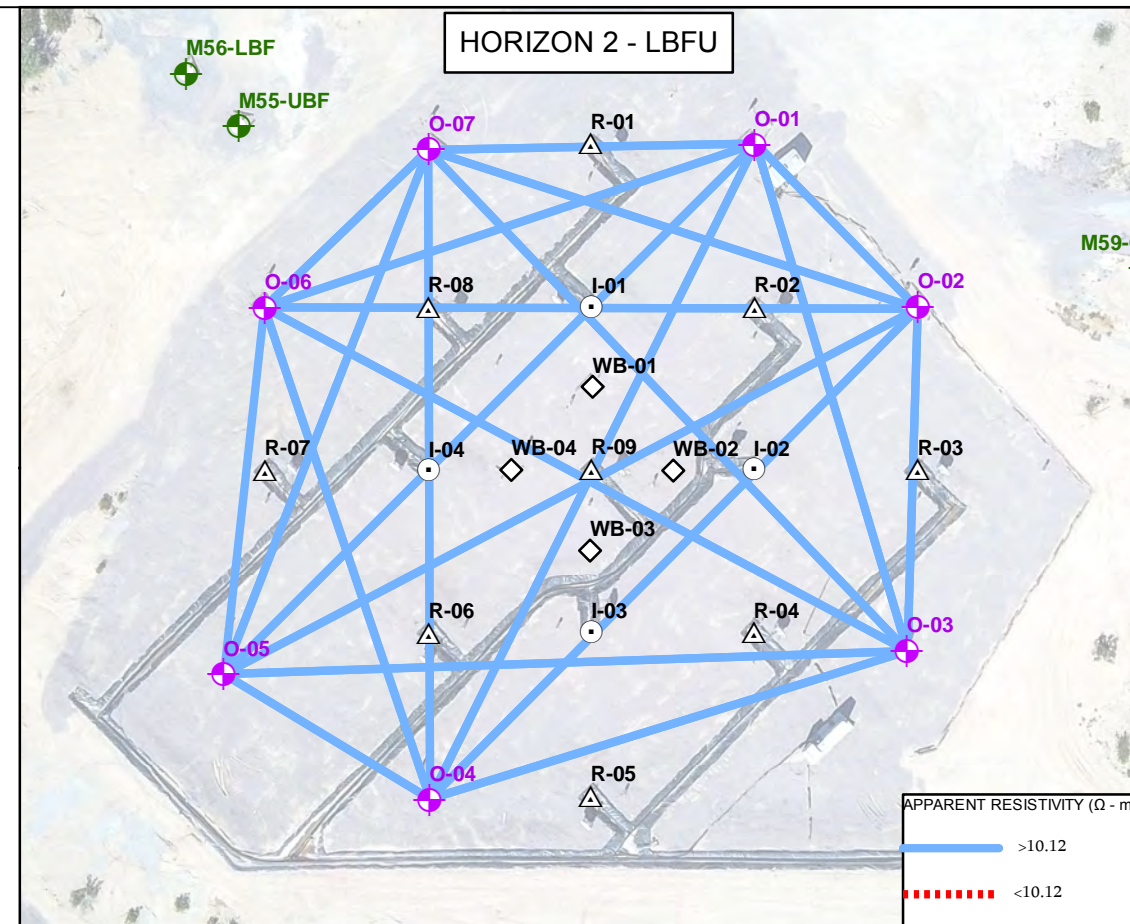
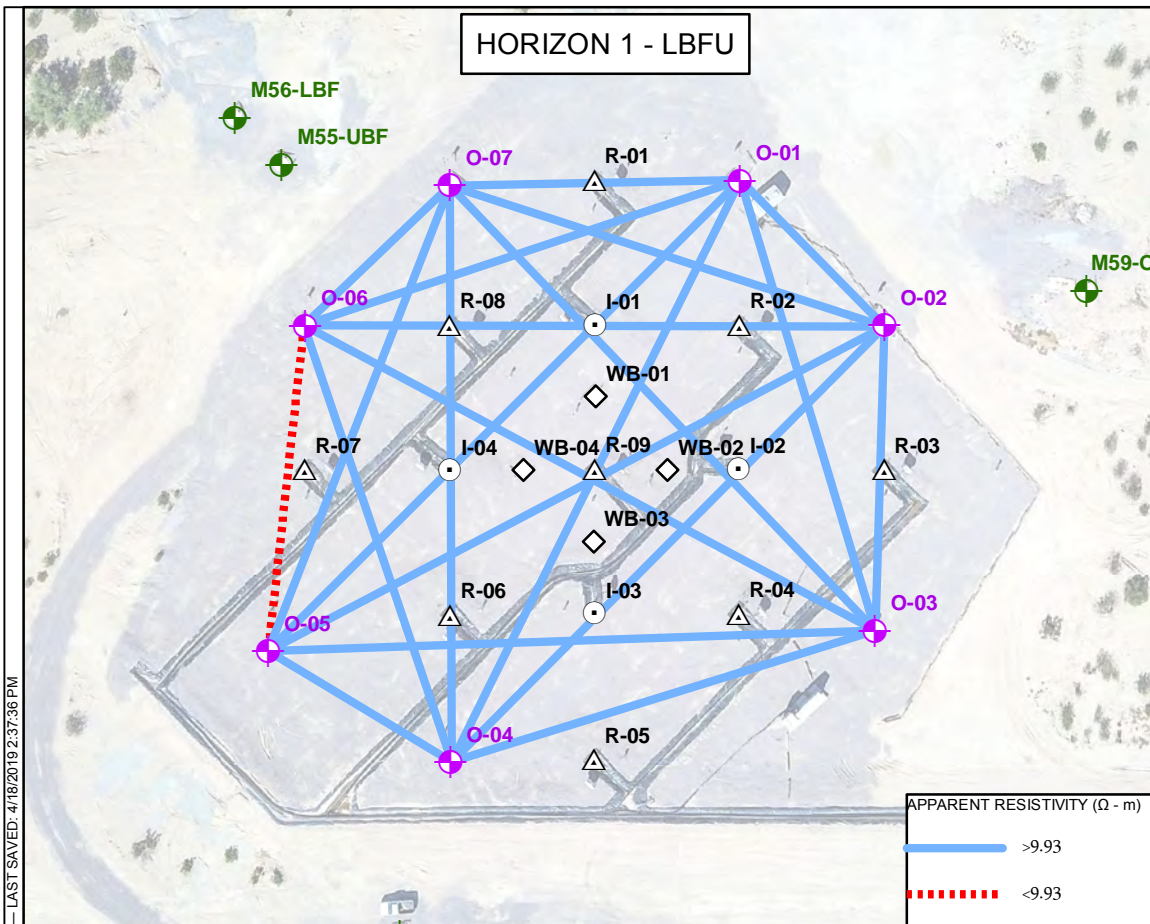
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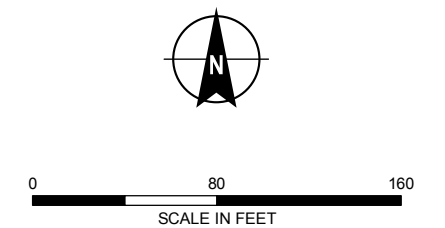


LEGEND

- INJECTION WELL
- OBSERVATION WELL
- RECOVERY WELL
- SUPPLEMENTAL MONITORING WELL
- WESTBAY WELL
- PTF WELLFIELD
- STATE LAND LEASE

NOTES

- ALL LOCATIONS AND DIMENSIONS APPROXIMATE
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- AERIAL IMAGERY SOURCE: FLORENCE COPPER INC., OCTOBER 2018



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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

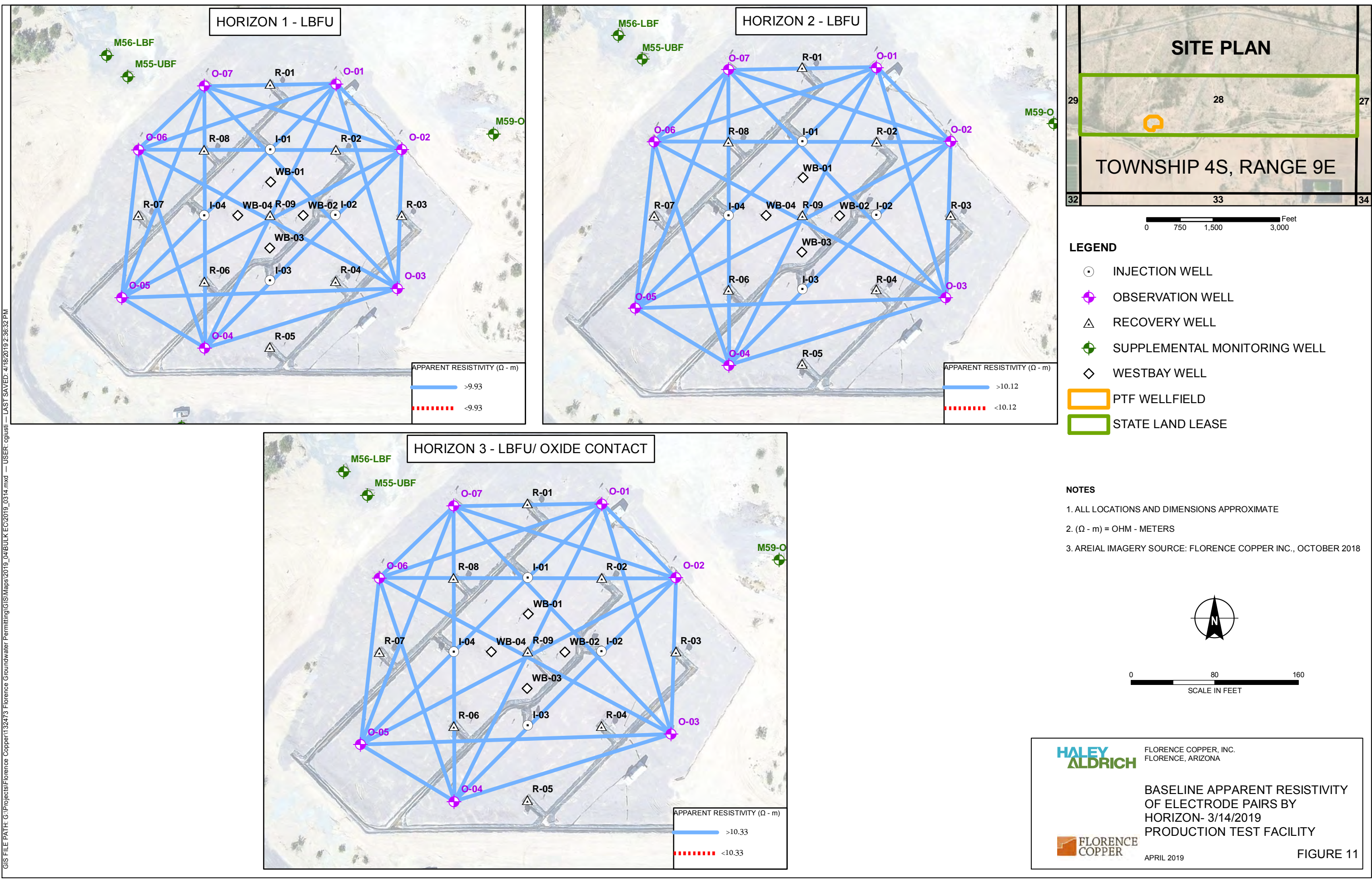
FLORENCE
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BASELINE APPARENT RESISTIVITY
OF ELECTRODE PAIRS BY
HORIZON- 03/06/2019
PRODUCTION TEST FACILITY

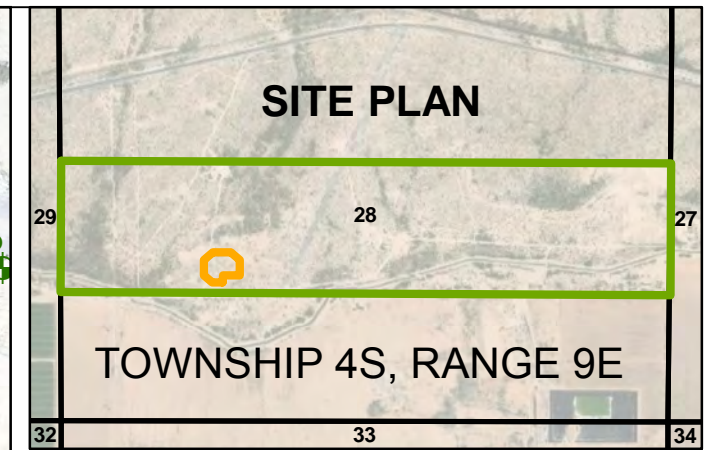
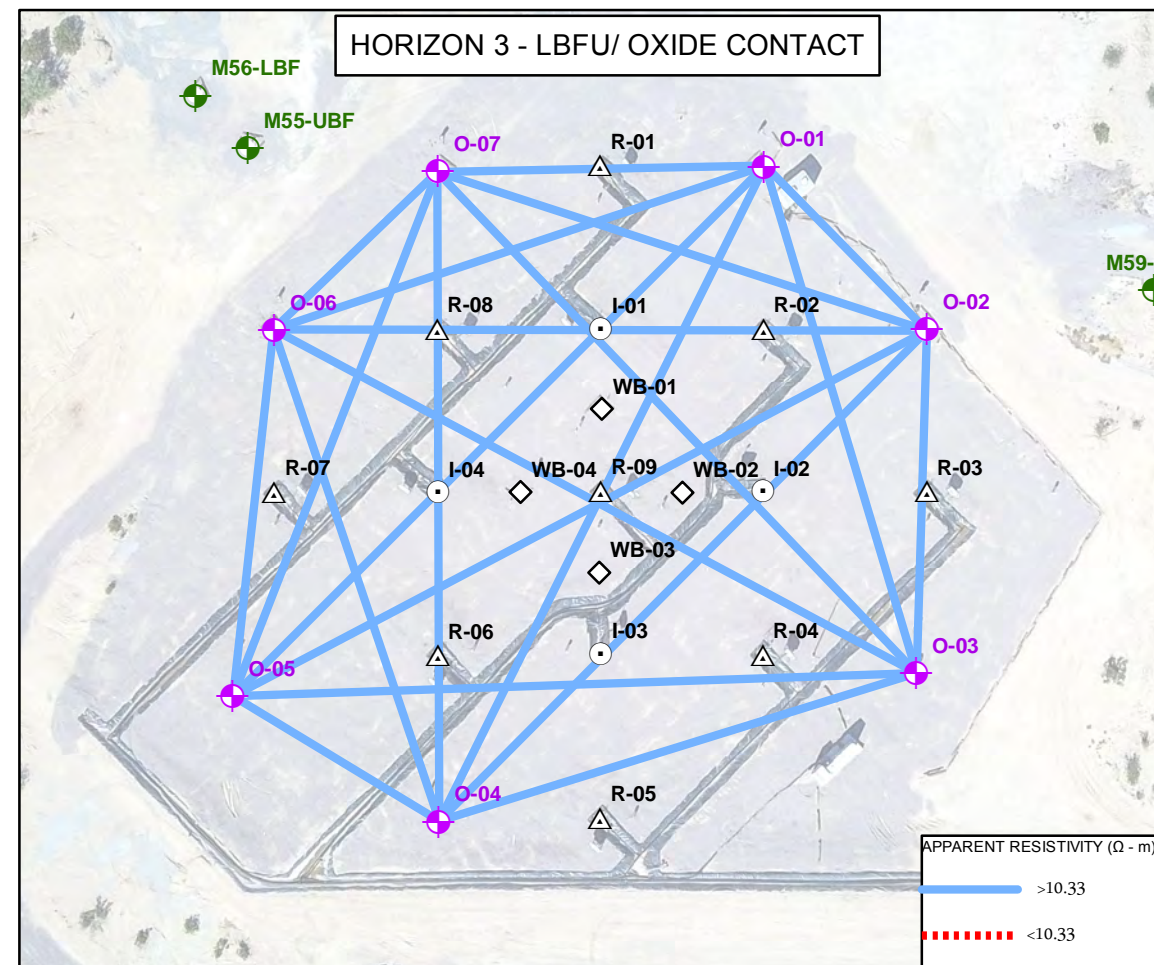
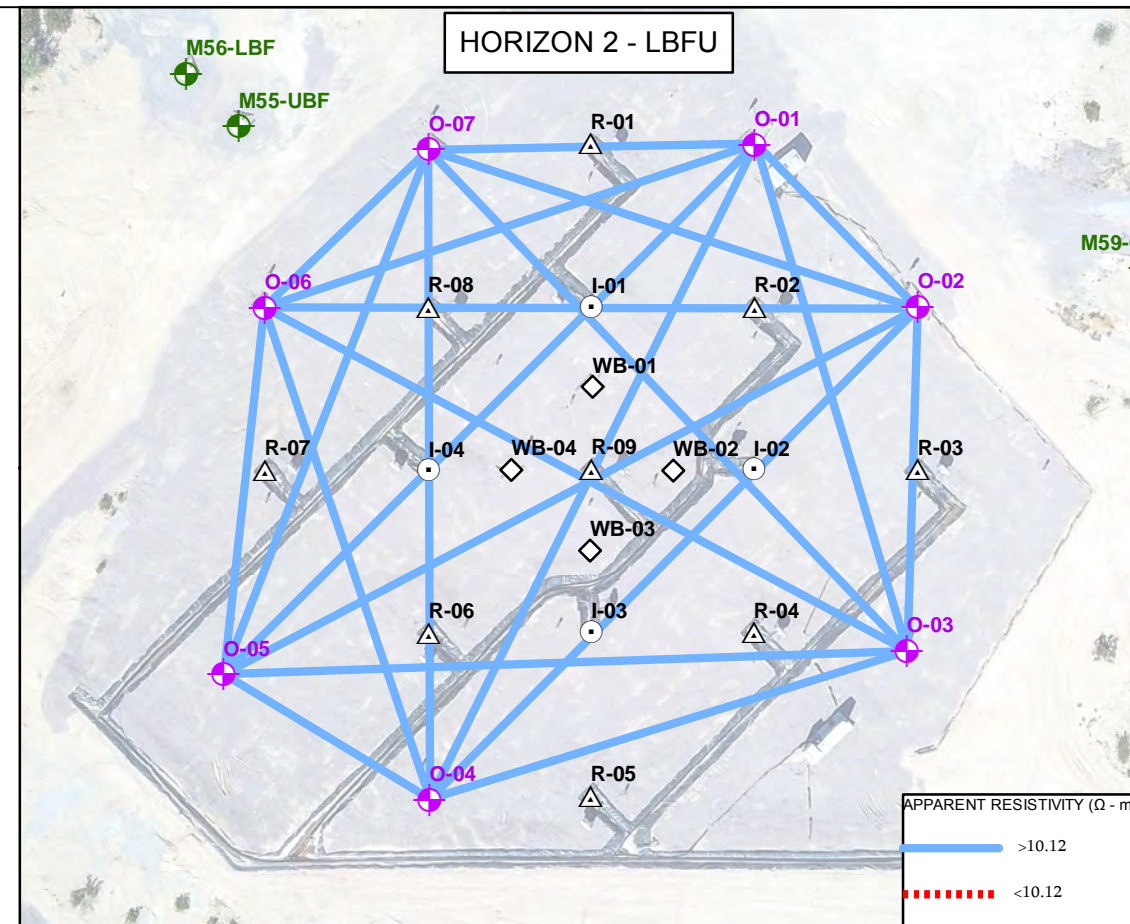
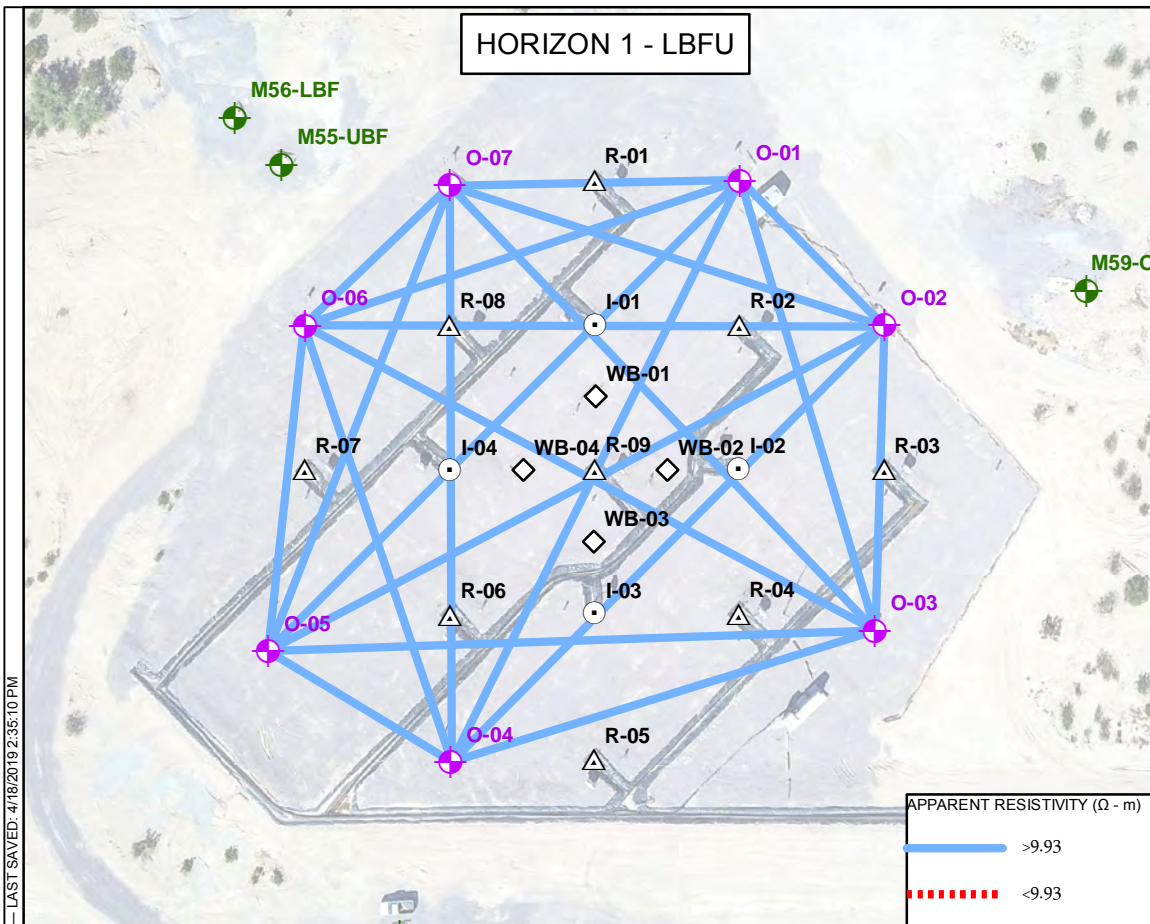
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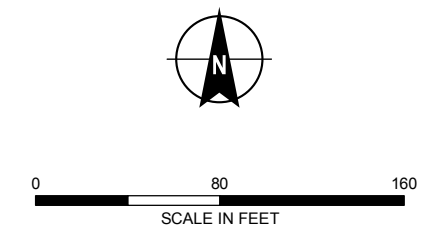


LEGEND

- INJECTION WELL
- OBSERVATION WELL
- RECOVERY WELL
- SUPPLEMENTAL MONITORING WELL
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NOTES

- ALL LOCATIONS AND DIMENSIONS APPROXIMATE
- ($\Omega \cdot m$) = OHM - METERS
- AERIAL IMAGERY SOURCE: FLORENCE COPPER INC., OCTOBER 2018



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FLORENCE, ARIZONA

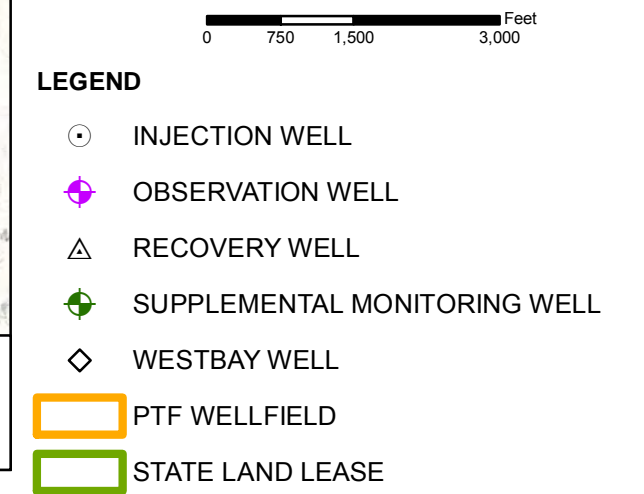
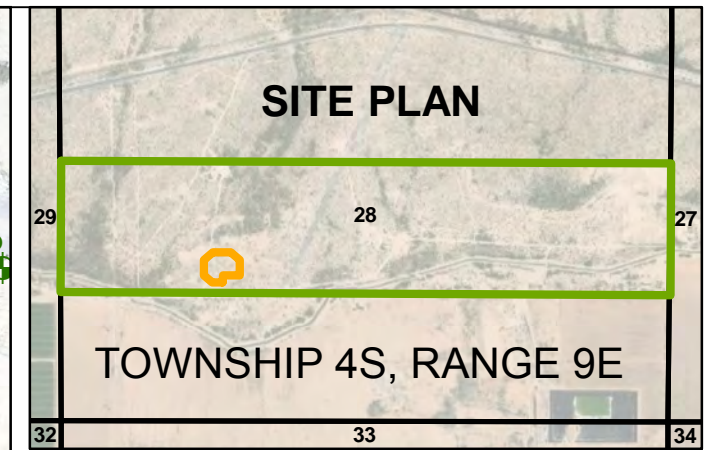
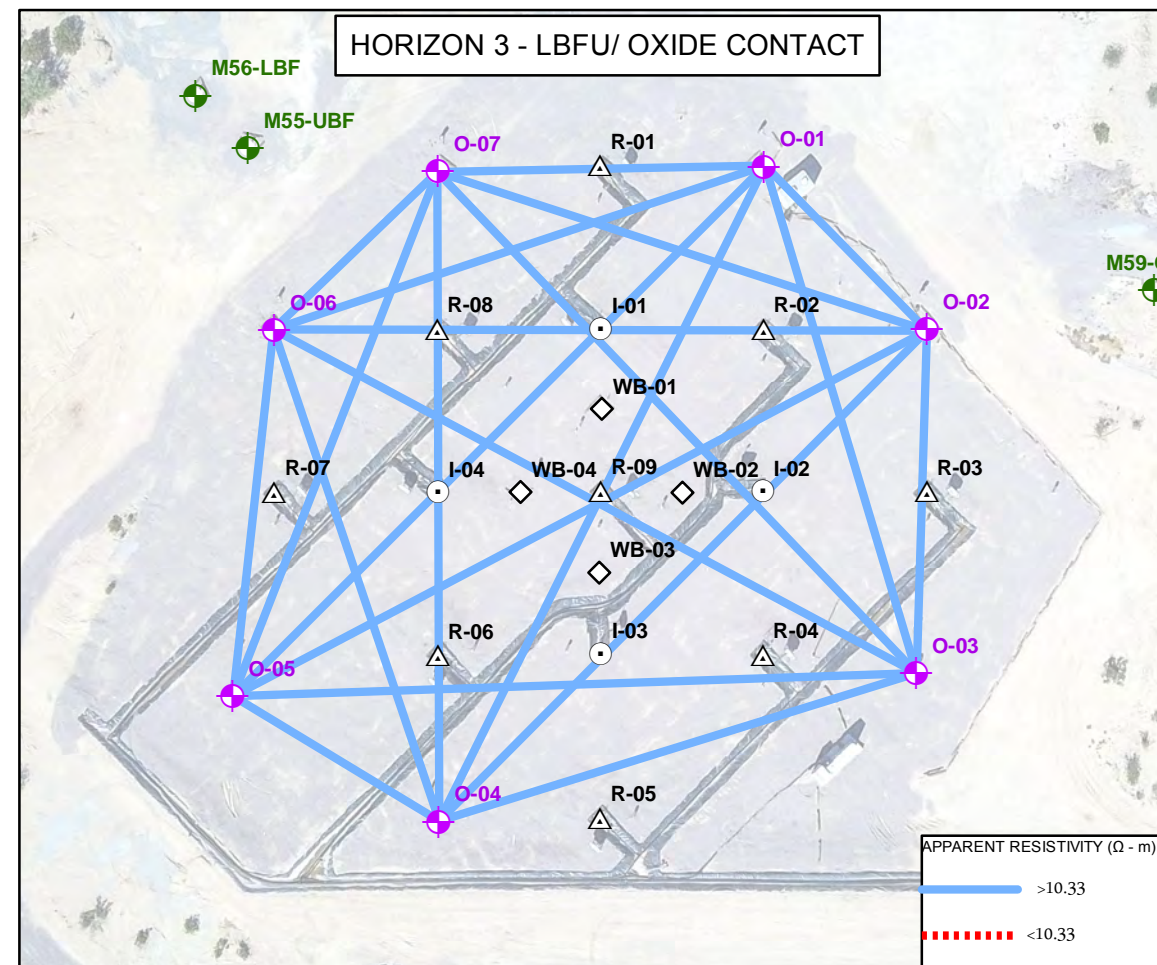
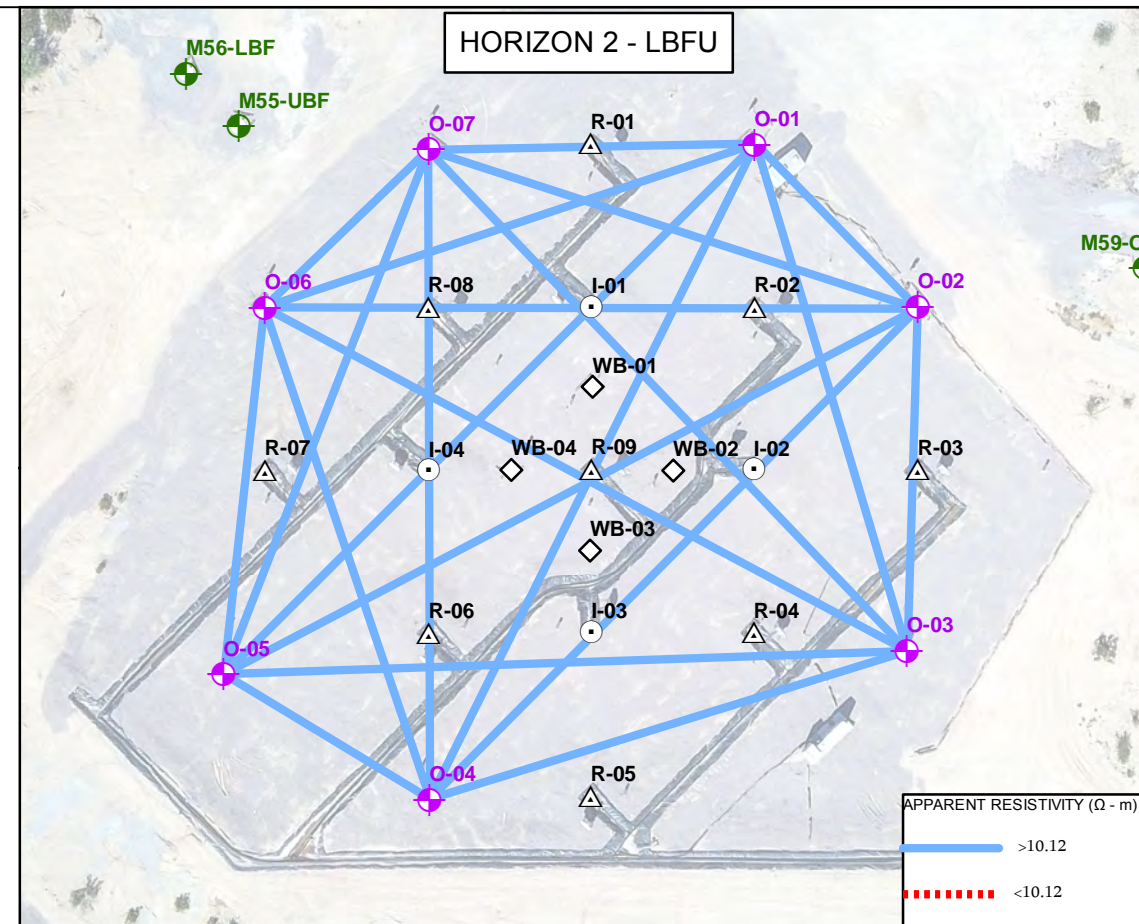
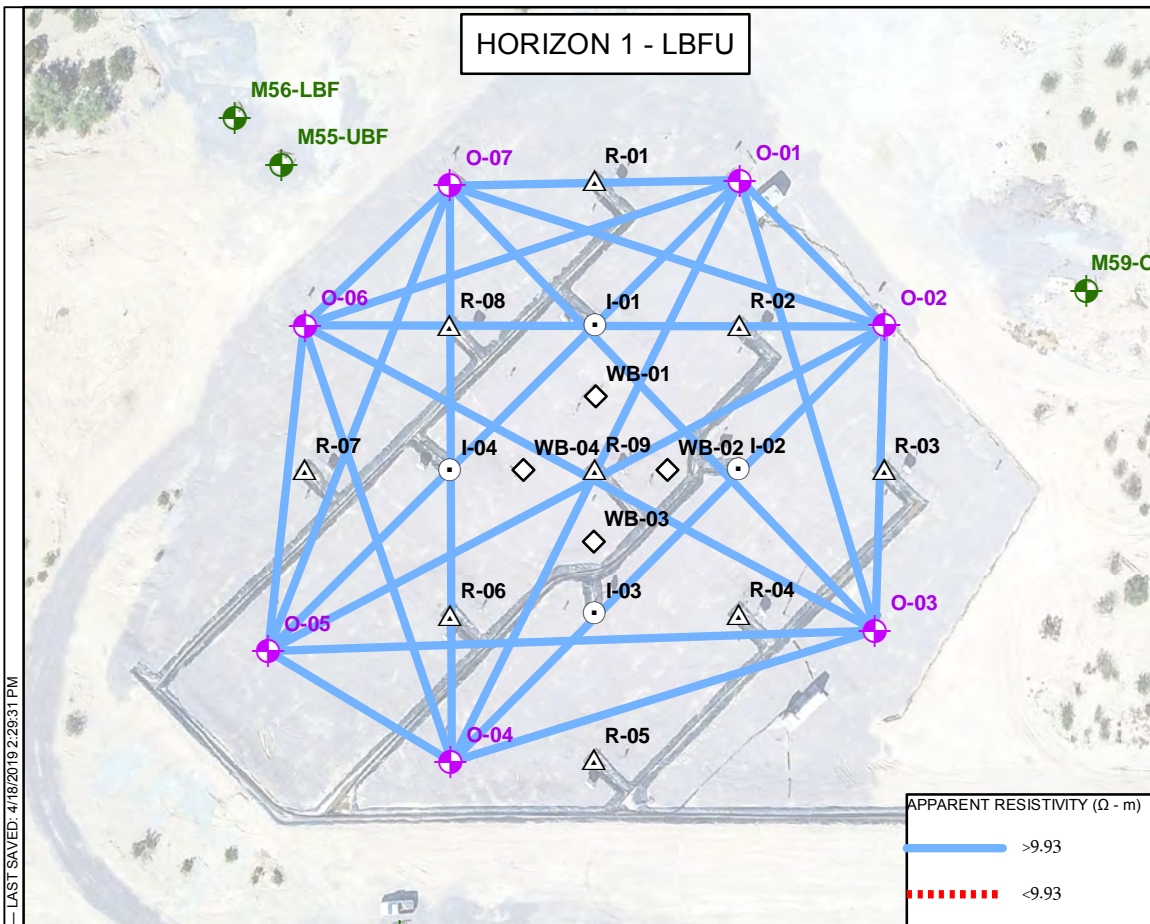
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BASELINE APPARENT RESISTIVITY
OF ELECTRODE PAIRS BY
HORIZON- 3/21/2019
PRODUCTION TEST FACILITY

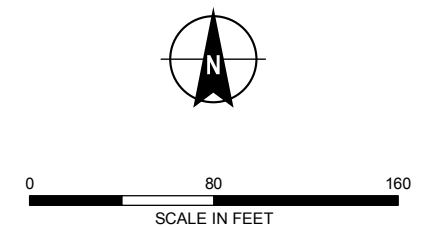
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- ### NOTES
1. ALL LOCATIONS AND DIMENSIONS APPROXIMATE
 2. ($\Omega \cdot m$) = OHM - METERS
 3. AREIAL IMAGERY SOURCE: FLORENCE COPPER INC., OCTOBER 2018



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BASELINE APPARENT RESISTIVITY
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HORIZON- 3/28/2019
PRODUCTION TEST FACILITY

APRIL 2019

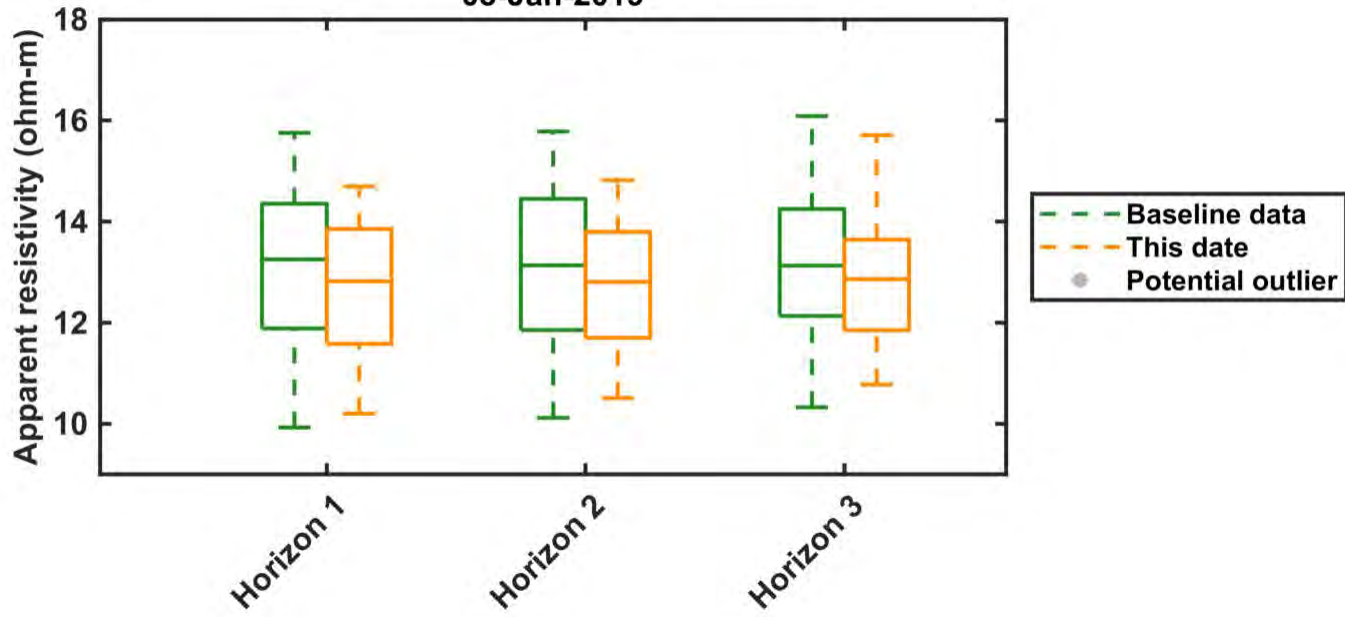
FIGURE 13

ATTACHMENT A

Box Diagrams for First Quarter Monitoring Data

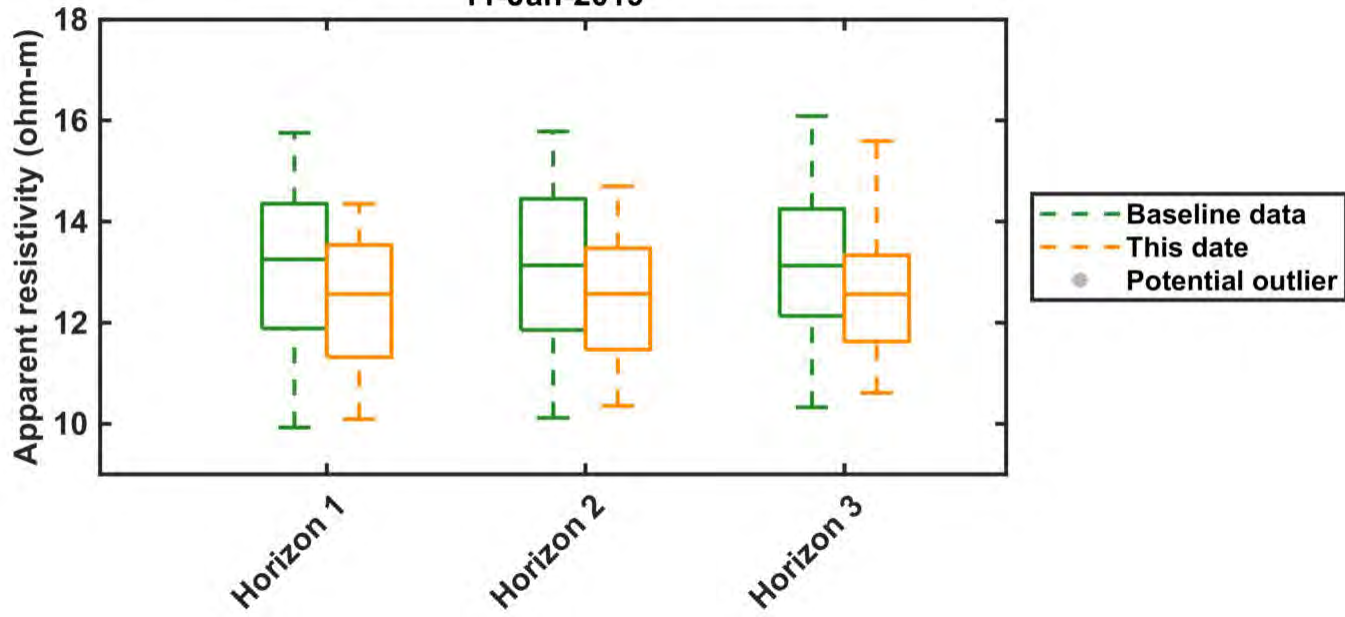
Florence electrical conductivity monitoring

03-Jan-2019



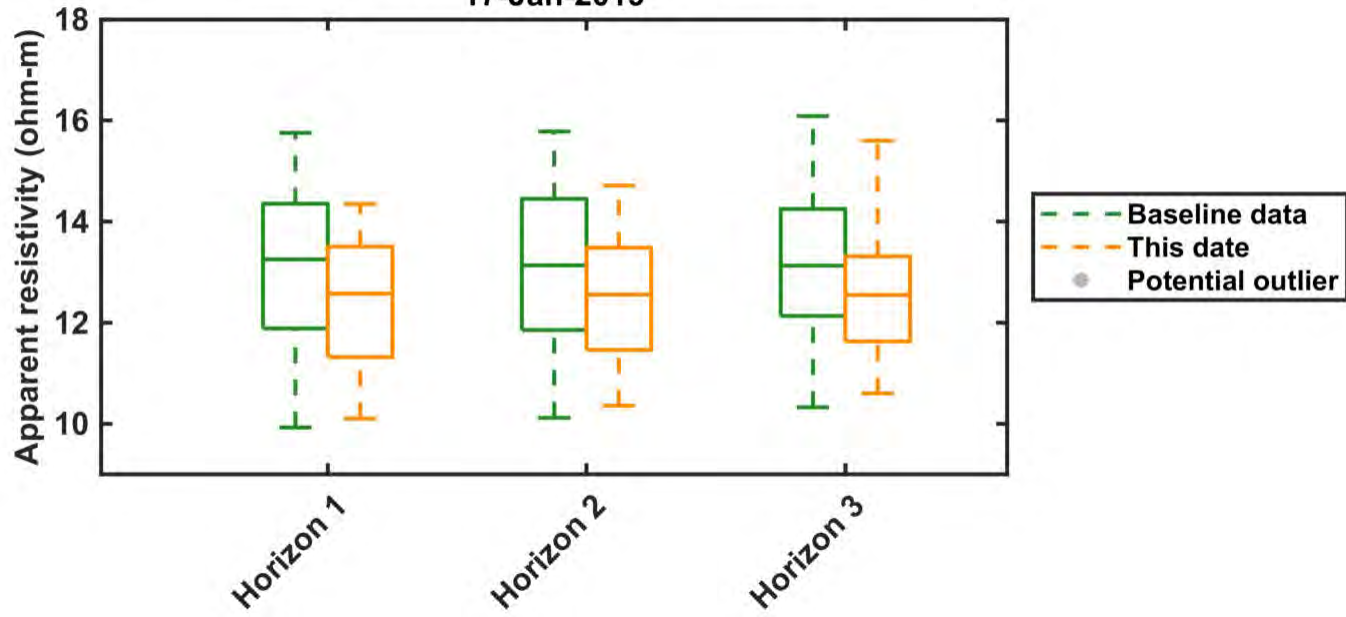
Florence electrical conductivity monitoring

11-Jan-2019



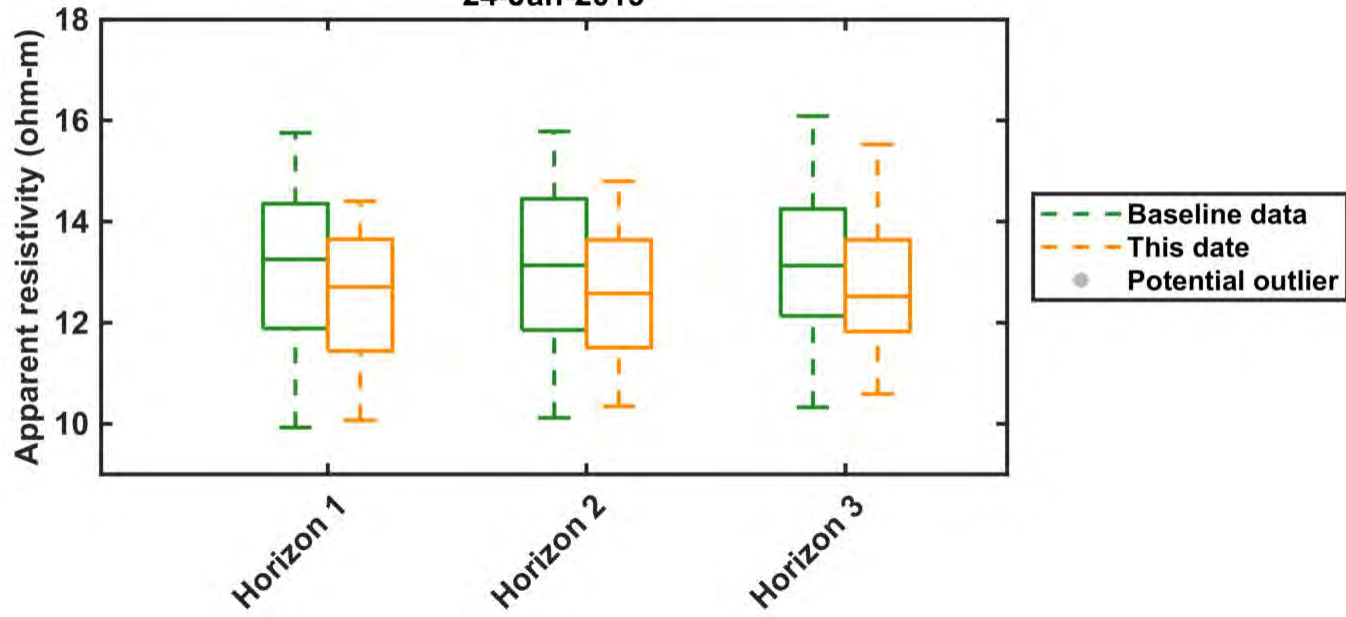
Florence electrical conductivity monitoring

17-Jan-2019



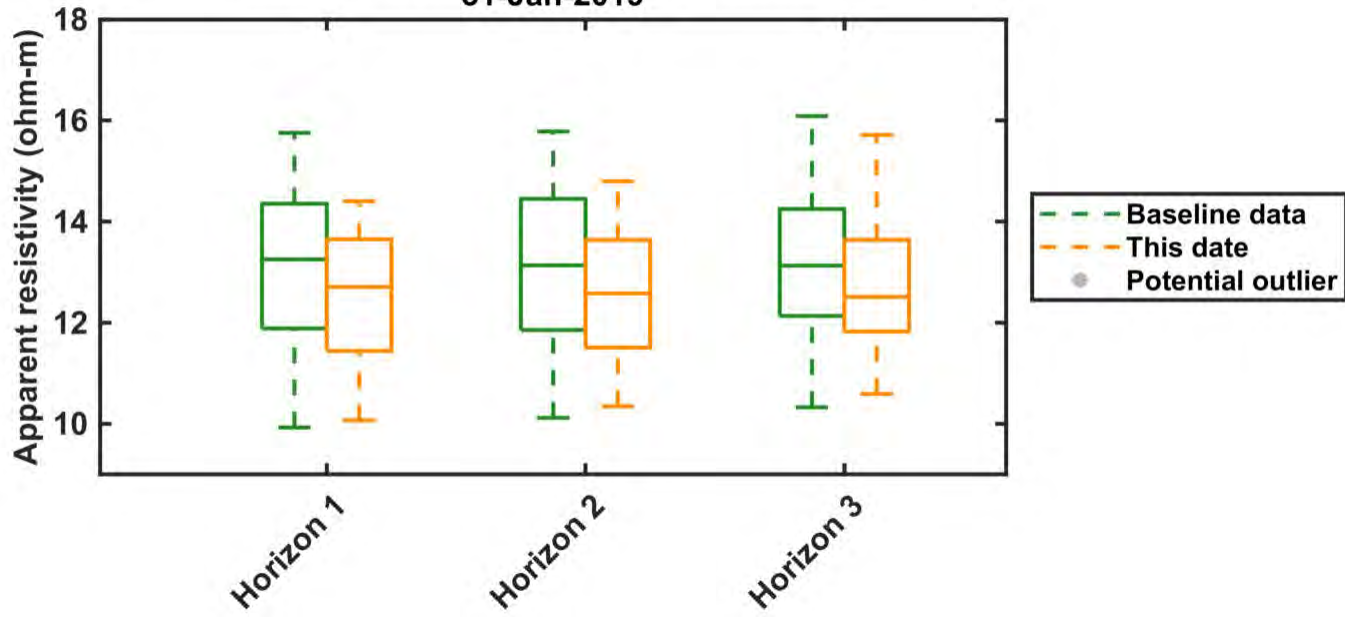
Florence electrical conductivity monitoring

24-Jan-2019



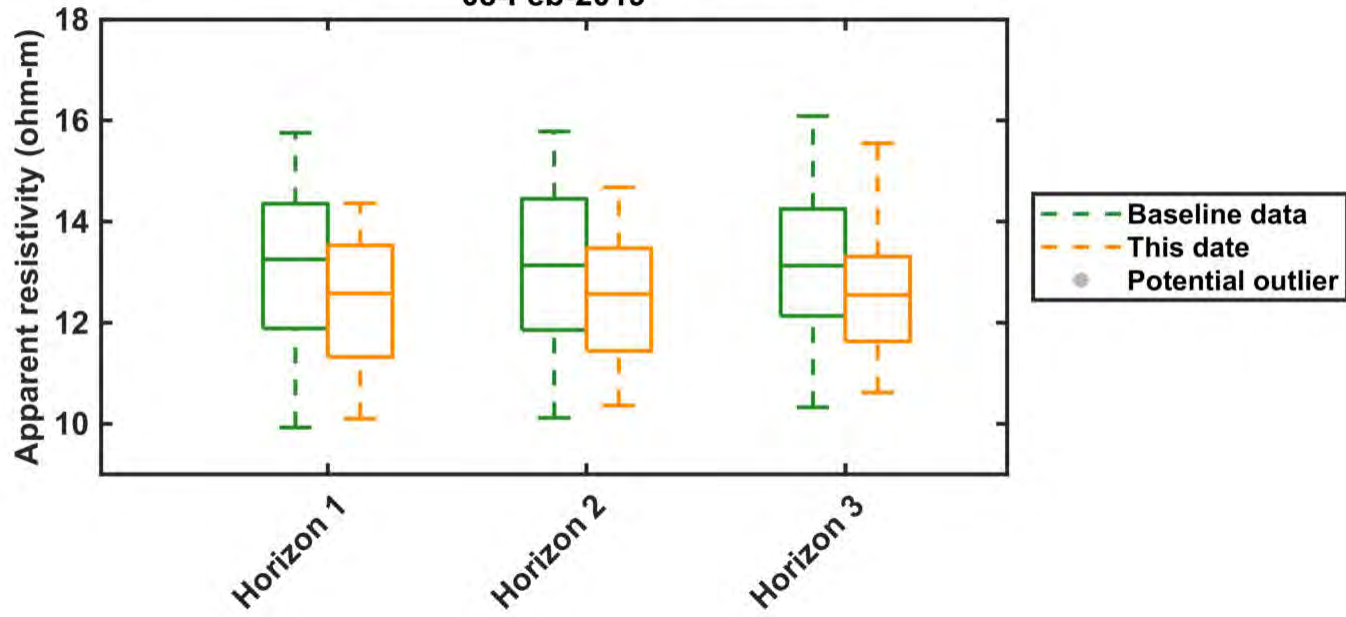
Florence electrical conductivity monitoring

31-Jan-2019



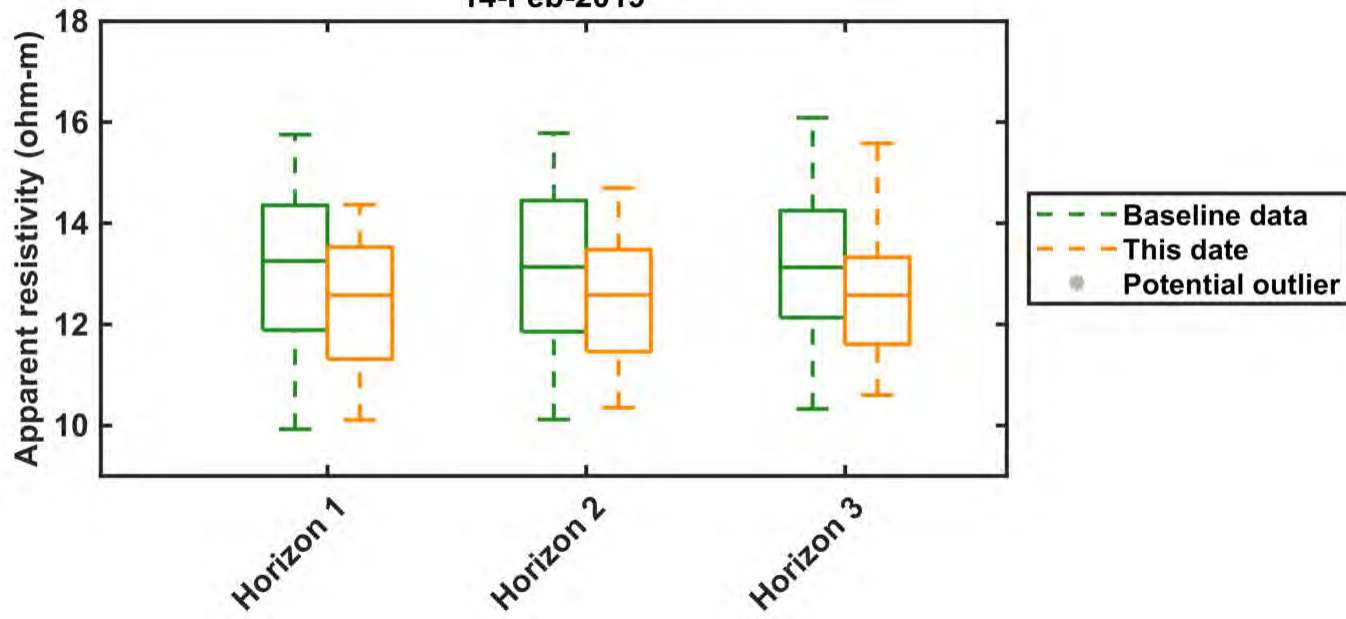
Florence electrical conductivity monitoring

08-Feb-2019



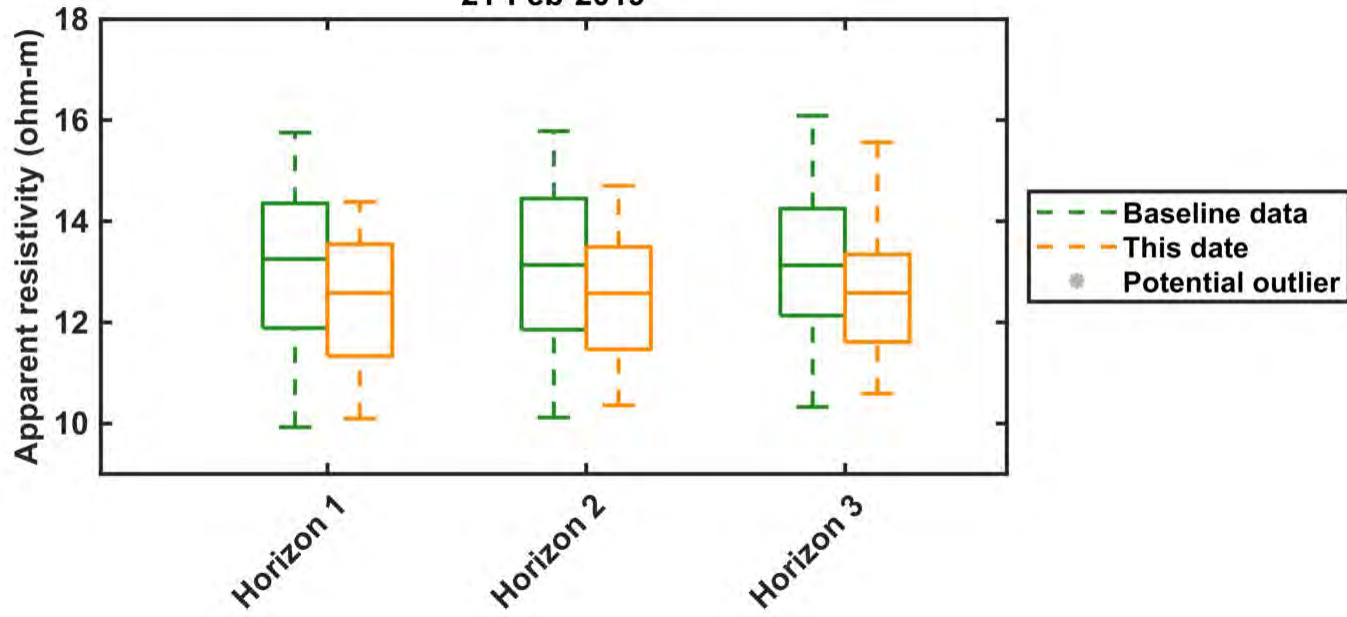
Florence electrical conductivity monitoring

14-Feb-2019



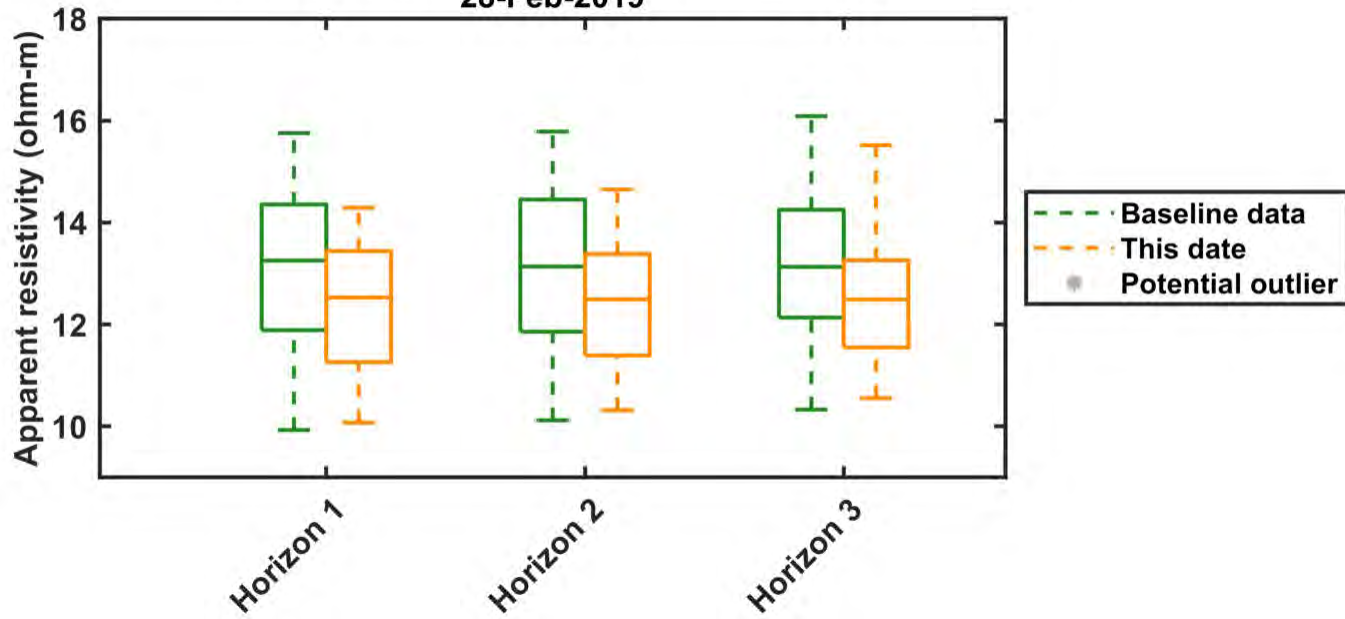
Florence electrical conductivity monitoring

21-Feb-2019



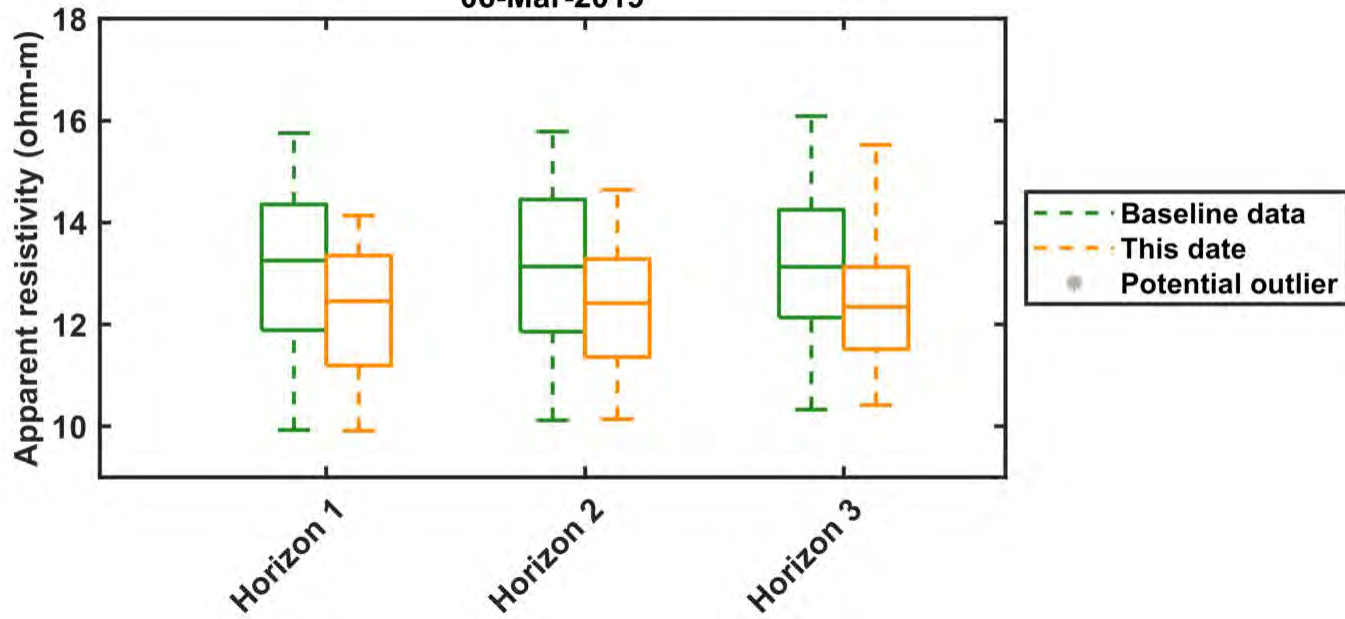
Florence electrical conductivity monitoring

28-Feb-2019



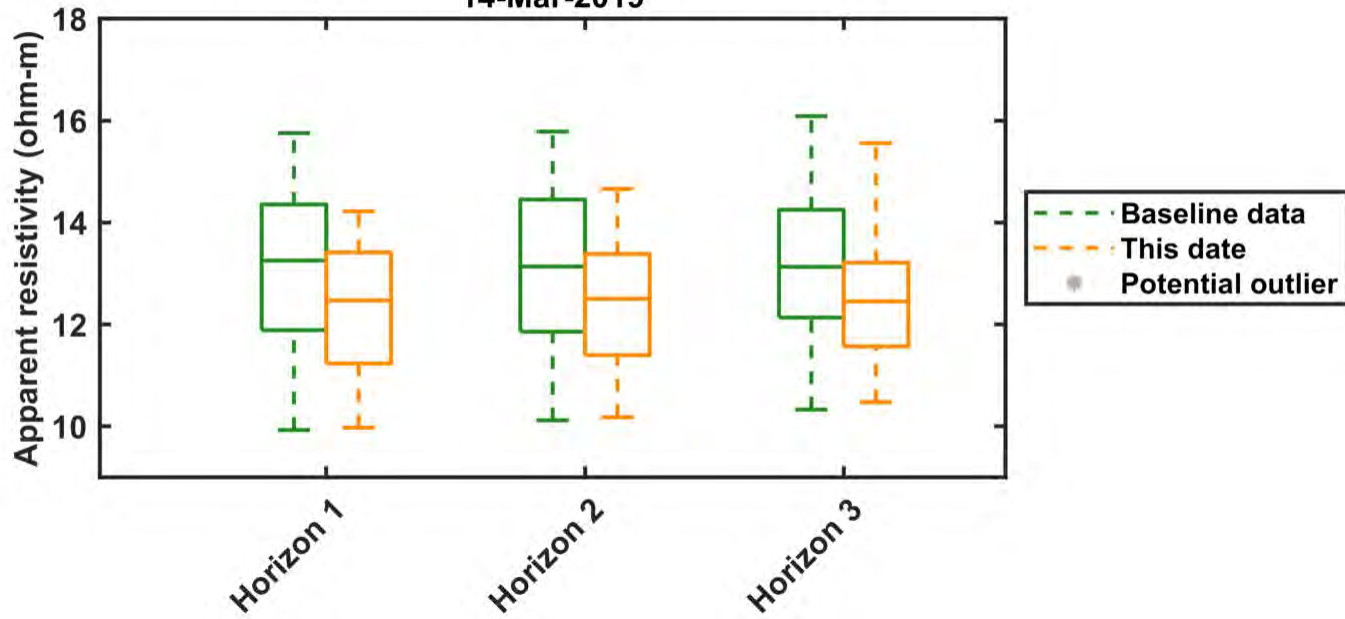
Florence electrical conductivity monitoring

06-Mar-2019



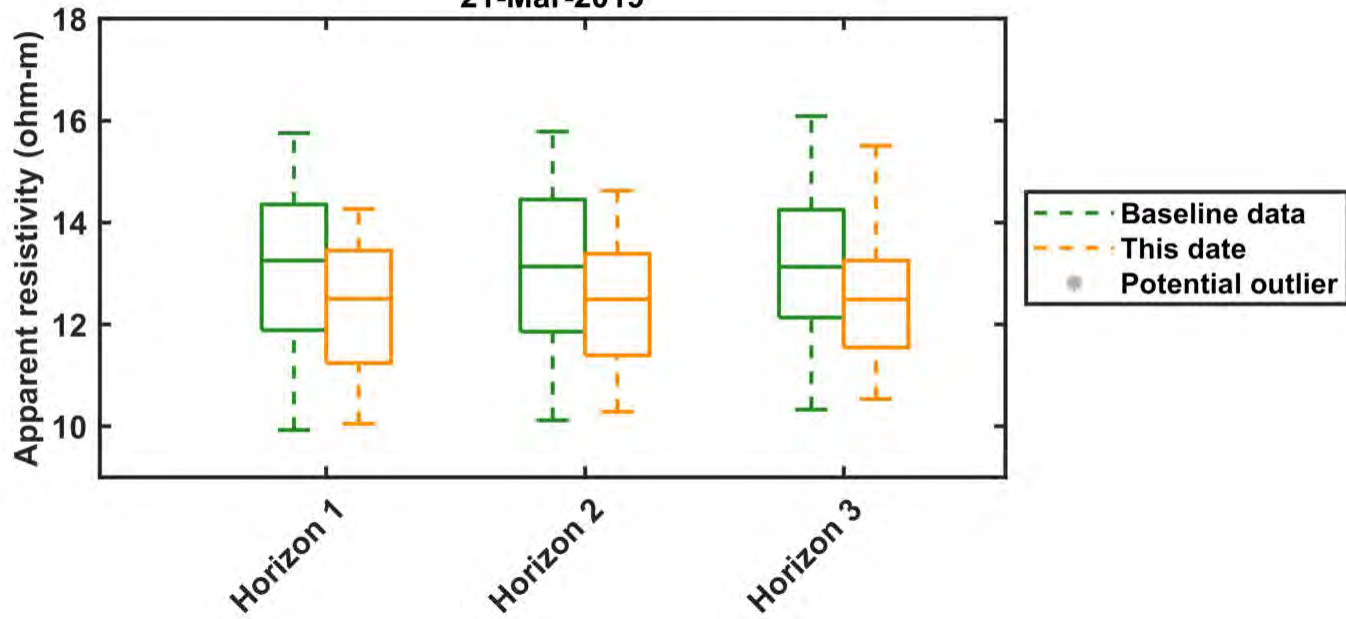
Florence electrical conductivity monitoring

14-Mar-2019



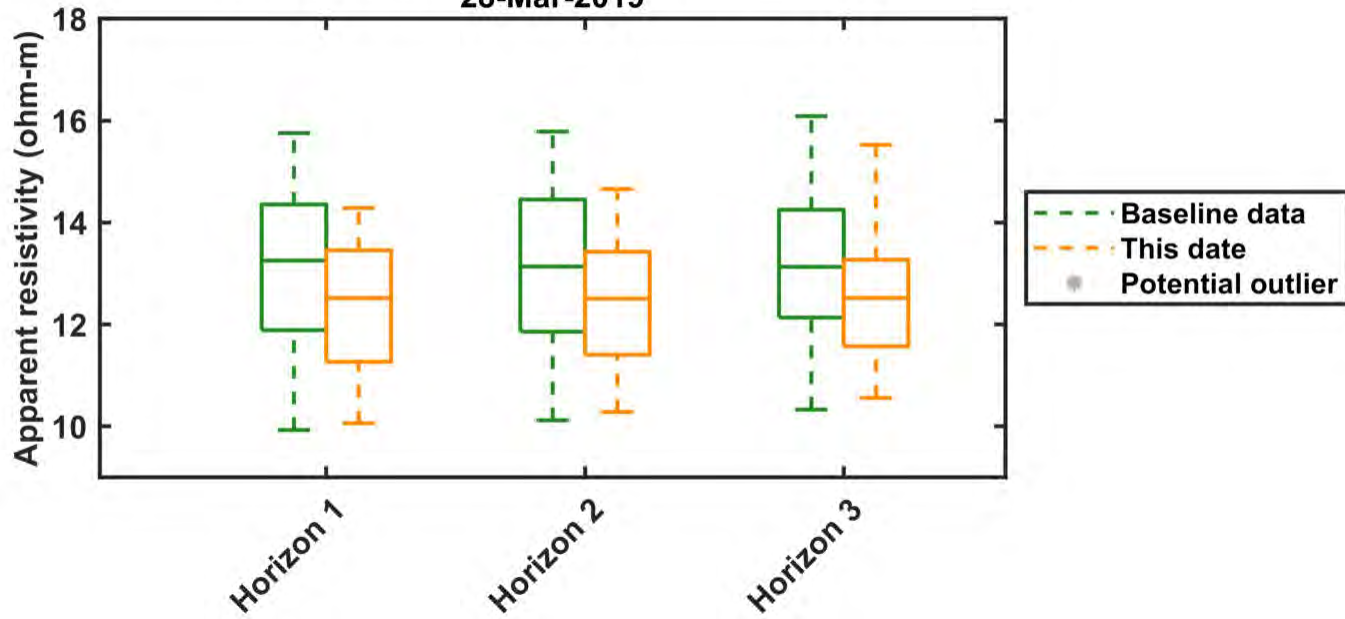
Florence electrical conductivity monitoring

21-Mar-2019



Florence electrical conductivity monitoring

28-Mar-2019



ATTACHMENT B

Summary Plot of Bulk Electrical Conductivity

Florence ambient electrical conductivity monitoring

Apparent resistivity in horizons 1-3 over time

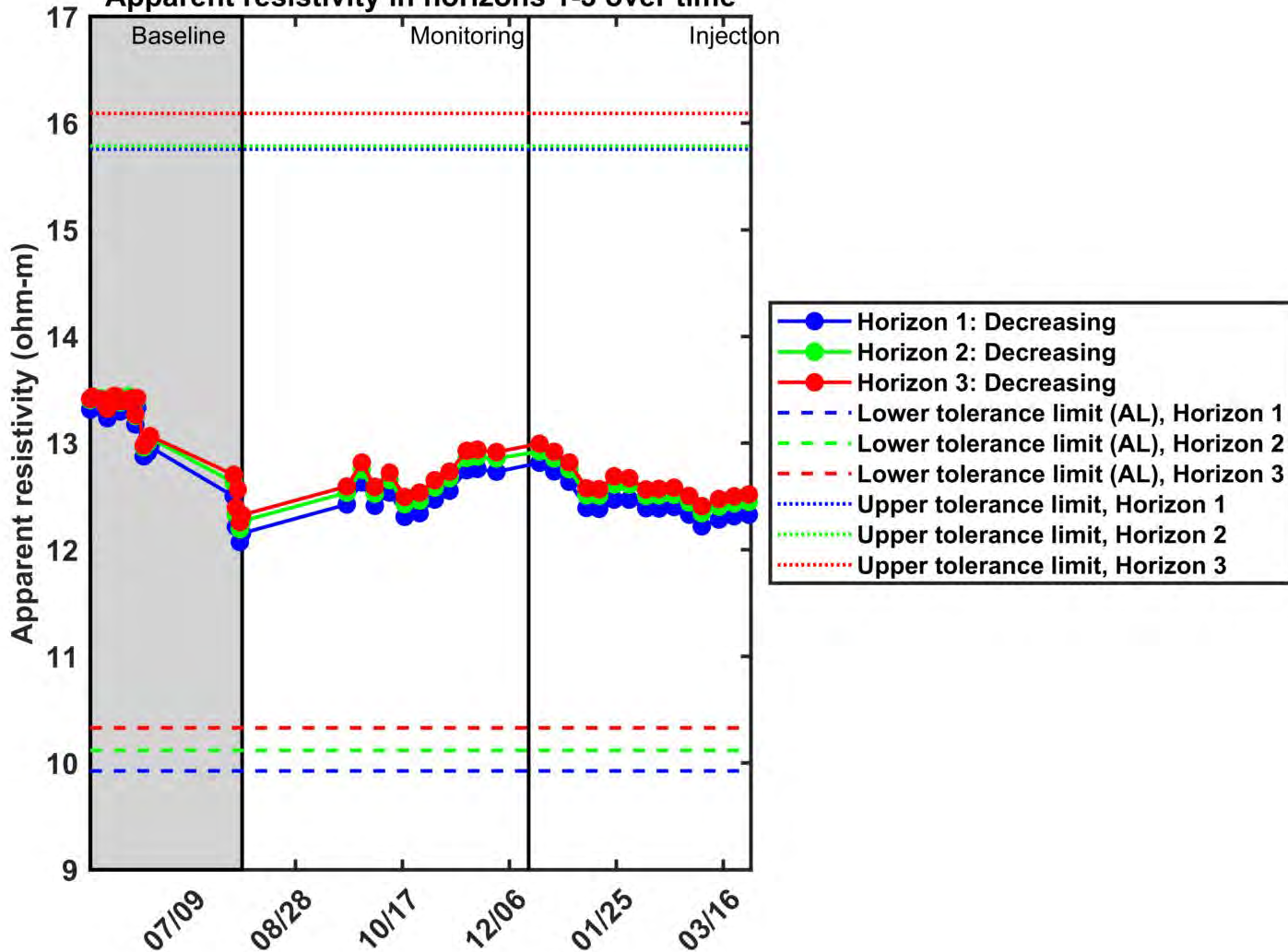


EXHIBIT D-6

**APP Amendment Application Attachment 13,
Technical Requirements – Contingency Plan**

Attachment 13

**Technical Requirements – Contingency Plan (Item 19G)
Application to Amend APP No. P-101704**

**Florence Copper Project
Florence Copper Inc.**

June 2019

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Application to Amend Aquifer Protection Permit No. P-101704 Florence Copper Project

Attachment 13 (Item 19G): Technical Requirements — Contingency Plan

13.1 INTRODUCTION

This Attachment conveys the contingency plan proposed in support of the application for significant amendment (application) of Aquifer Protection Permit (APP) No. P-101704 requested by Florence Copper Inc. (Florence Copper) in accordance with Arizona Administrative Code (A.A.C.) R18-9-A211(A)(1). The information presented in this Attachment is provided in response to Item 19G (Contingency Plan) of the application form.

As required by A.A.C. R18-9-A204, the Contingency Plan presented in this Attachment includes policies and procedures for detecting and responding to:

- A violation of an Aquifer Water Quality Standard (AWQS) or an Aquifer Quality Limit (AQL);
- A violation of a discharge limitation;
- A violation of any other permit condition;
- An exceedance of an Alert Level (AL); or
- An imminent and substantial endangerment to the public health or the environment.

Sections 13.2 through 13.4 of this Attachment provide an overview of general contingency and emergency response procedures. Section 13.5 provides a description of plans for responding to specific events. Section 13.7 provides a formal review of plan elements as they may be translated into permit requirements.

13.2 CONTINGENCY PLAN ELEMENTS

The Contingency Plan includes the following elements:

- Document control;
- A description of the general procedures to ensure unauthorized discharges are promptly addressed and mitigated;
- An emergency response procedure in the event of an imminent and substantial endangerment to the public health or the environment; and
- Descriptions of contingency planning to address specific events.

13.3 DOCUMENT CONTROL

Once approved, this Contingency Plan will be maintained in the locations where day-to-day decisions for operating the planned in-situ copper recovery (ISCR) facility are made. Additional copies of the Contingency Plan may be maintained at other locations as appropriate. All employees responsible for the operation of the ISCR facility will be advised of the location of the Contingency Plan.

The Contingency Plan will be formally reviewed on an annual basis, or in the event of a discharge resulting in any of the conditions identified in Section 13.1, whichever comes sooner. The Contingency Plan will also be promptly revised upon any change to the information in the plan.

Document control will be maintained to ensure that all revisions are promptly included and correctly replaced in all copies of the Contingency Plan. The Contingency Plan, and revisions, will be signed and approved by the Florence Copper general manager.

13.4 EMERGENCY RESPONSE PROVISIONS TO ADDRESS AN IMMINENT AND SUBSTANTIAL ENDANGERMENT TO PUBLIC HEALTH OR THE ENVIRONMENT

13.4.1 Conditions Requiring Emergency Response

Florence Copper will act immediately to correct any condition resulting from an unauthorized discharge on the Florence Copper Project (FCP) site if that condition could pose an imminent and substantial endangerment to the public health or environment, such as the following:

- A release that occurs outside a containment area and that exceeds a reportable quantity limit as per reporting requirements in the Comprehensive Environmental Response, Compensation and Liability Act or the Superfund Amendments and Reauthorization Act;
- A catastrophic failure of tanks or water impoundment; and
- A catastrophic event such as a flood that exceeds the 100-year storm event, an earthquake or fire, civil unrest, or vandalism that causes a release to the environment.

13.4.2 Designation of an Emergency Response Coordinator

An emergency response coordinator will be responsible for the activation of this Contingency Plan to address an imminent and substantial endangerment to public health or the environment. The emergency response coordinator will be the FCP general manager, or other employee delegated with the authority to act as emergency response coordinator. The emergency response coordinator will be appropriately trained and will have the necessary level of experience and supervising authority to commit resources to respond to and address an imminent and substantial endangerment to public health or the environment. The primary emergency response coordinator's name and contact location, and telephone numbers will be posted at all times in the FCP control room. The primary emergency response coordinator will delegate authority to an appropriate alternate to act as emergency response coordinator in the primary emergency coordinator's absence.

13.4.3 Notification

Upon notification of a condition that could pose an imminent and substantial endangerment to public health or the environment, the emergency response coordinator will immediately notify:

- Local emergency services – 1-520-866-6411 within 24 hours for any unauthorized discharge of hazardous or non-hazardous material which (a) has the potential to cause an Aquifer Quality

Limit (AQL) to be exceeded, or (b) could pose an endangerment to public health or the environment;

- The National Response Center for any reportable quantity released to the environment – 1-800-424-8802;
- Arizona Department of Environmental Quality (ADEQ) – 1-602-771-2300;
- The FCP general manager, if the emergency response coordinator is not the general manager. The name and telephone number of the general manager and/or the emergency response coordinator will be placed in each copy of the FCP Contingency Plan;
- Corporate management; and
- Emergency response contractors, as appropriate.

13.4.4 Preparation for Response to Reported Conditions

Florence Copper will ensure that all FCP personnel are trained and certified in first aid, chemical safety, and in the use of Material Safety Data Sheets in accordance with applicable federal, state, and local health, safety, and environmental regulations. In addition, personnel will receive spill- and emergency-response training to identify, clean-up, report on, and otherwise manage unauthorized discharges relative APP No. P-101704. this Contingency Plan and related features of the Storm Water Pollution Prevention Plan (SWPPP). The Contingency Plan and the SWPPP will be posted in the FCP control room and will be reviewed at least annually by the Technical Service Manager and revised as necessary.

The FCP will be equipped with spill-response clean-up materials and equipment suitable to address minor spills. The clean-up materials and equipment will be for protecting employees, equipment, and the environment from acidic, corrosive, or otherwise damaging materials and will include, but not be limited to, protective gear, spill containment booms, lime for acid neutralization, and waste disposal bins. The location of all such equipment will be shown on a poster in the FCP control room.

Florence Copper will maintain plans with local response emergency agencies and with emergency response contractors, as appropriate, for responses to imminent and substantial endangerment to public health or the environment.

13.4.5 Emergency Response Procedures

Upon notification of a condition that could pose an imminent and substantial endangerment to public health or the environment, the emergency response coordinator will immediately assess possible hazards associated with the reported condition.

If the emergency response coordinator determines the reported condition does not pose an imminent and substantial endangerment to public health or the environment, they will direct actions to promptly cease the discharge and isolate the discharged material. Discharged material will be removed as soon as possible. Within 24 hours following the discovery of a discharge of hazardous or non-hazardous

material which has the potential to cause an AQL to be exceeded, the emergency response coordinator will notify the ADEQ Groundwater Protection Value Stream of corrective actions taken and planned.

If the emergency response coordinator determines the reported condition could pose an imminent and substantial endangerment to public health or the environment, they will direct actions to promptly:

- Notify consistent with Section 13.4.3;
- Notify all facility personnel of the condition and advise them of any area to be evacuated/isolated;
- Direct that operations be discontinued as appropriate to stop the discharge;
- Take steps to safely isolate and contain material discharged;
- Begin the process of recording information regarding the nature and extent of discharges potentially causing the imminent and substantial endangerment to public health or the environment and recording information on individuals who may have been exposed during the incident, including the name of individuals, the nature of exposure, and any medical treatment the individual received.

13.4.6 Reports of Responses to Conditions Potentially Causing Imminent and Substantial Endangerment to Public Health or the Environment

Florence Copper will submit a written report to the ADEQ Groundwater Protection Value Stream for any unauthorized discharge of hazardous or non-hazardous material which (a) has the potential to cause an Aquifer Quality Limit (AQL) to be exceeded, or (b) could pose an endangerment to public health or the environment. The report will be submitted within 30 days of the discharge and will summarize the event, including any human exposure, and will provide a description of response activities and results of those activities.

13.5 CONTINGENCY PLAN REQUIREMENTS

The following Contingency Plan requirements (Section 2.6) will be replaced by provisions of the amended APP No. P-101704 when it is issued by ADEQ. The section numbering and language presented below reflect the anticipated numbering and proposed language for contingency plan section of the amended APP No. P-101704.

2.6 Contingency Plan Requirements

[Arizona Revised Statutes (A.R.S.) § 49-243(K)(3), (K)(7) and A.A.C. R18-9-A204 and R18-9-A205]

2.6.1 General Contingency Plan Requirements

At least one copy of this permit and the approved contingency and emergency response plans submitted in the application shall be maintained at the location where day-to-day decisions regarding the operation of the facility are made. The permittee shall be aware of and follow the contingency and emergency plans.

Any AL that is exceeded or any violation of an AQL, discharge limit (DL), or other permit condition shall be reported to ADEQ following the reporting requirements in Section 2.7.3.

Some contingency actions may involve verification sampling. Verification sampling shall consist of the first follow-up sample collected from a location that previously indicated a violation or the exceedance of an AL. Collection and analysis of the verification sample shall use the same protocols and test methods to analyze for the pollutant or pollutants that exceeded an AL or violated an AQL. The permittee is subject to enforcement action for the failure to comply with any contingency actions in this permit. Where verification sampling is specified in this permit, it is the option of the permittee to perform such sampling. If verification sampling is not conducted within the timeframe allotted, ADEQ and the permittee shall presume the initial sampling result to be confirmed as if verification sampling has been conducted. The permittee is responsible for compliance with contingency plans relating to the exceedance of an AL or violation of a DL, AQL, or any other permit condition.

2.6.2 Exceeding of Alert Levels

2.6.2.1 Exceeding of Performance Levels Set for Operational Conditions

1. Performance Levels Set for Freeboard. In the event that freeboard performance levels in a surface impoundment listed in Section 4.1, Table 4.1-3 are not maintained, the permittee shall:
 - a. As soon as practicable, cease or reduce discharging to the impoundment to prevent overtopping. Remove and properly dispose or recycle to other operations the excess fluid in the reservoir until the water level is restored at or below the permitted freeboard limit.
 - b. Within 5 days of discovery, evaluate the cause of the incident and adjust operational conditions as necessary to avoid future occurrences.
 - c. Record in the facility log, the amount of fluid removed, a description of the removal method, and the disposal arrangements. The facility log shall be maintained according to Section 2.7.2 (Operational Inspection / Log Book Recordkeeping).
 - d. The facility is no longer on alert status once the operational indicator no longer indicates that the freeboard performance level is being exceeded. The permittee shall, however, complete all tasks necessary to return the facility to its pre-alert operating condition.
2. Performance Levels, Other Than Freeboard
 - a. If an operational performance level (PL) listed in Section 4.1, Table 4.1-3 has been observed or noted during required inspection and operational monitoring, such that the result could cause or contribute to an unauthorized discharge, the permittee shall immediately investigate to determine the cause of the condition. The investigation shall include the following:
 - i. Inspection, testing, and assessment of the current condition of all treatment or pollutant discharge control systems that may have contributed to the operational performance condition.
 - ii. Review of recent process logs, reports, and other operational control

information to identify any unusual occurrences.

- b. The PL exceedance, results of the investigation, and any corrective action taken shall be reported to the ADEQ Groundwater Protection Value Stream, within 30 days of the discovery of the condition. Upon review of the submitted report, the Department may amend the permit to require additional monitoring, increased frequency of monitoring, or other actions.
- c. The permittee shall initiate actions identified in the approved contingency plan referenced in Section 5 and any specific contingency measures identified in Section 2.6 to resolve any problems identified by the investigation which may have led to a PL being exceeded. To implement any other corrective action the permittee shall obtain prior approval from the ADEQ Groundwater Protection Value Stream according to Section 2.6.6.

2.6.2.2 Exceedance of Alert Level #1 for Normal Liner Leakage

If an Alert Level #1 (AL #1) as specified in Section 4.1, Table 4.1-4, has been exceeded, the permittee shall take the following actions:

1. Within 5 days of discovery, determine if the fluid in the collection sump is process water from the impoundment by measuring the pH and conductivity of fluids in the impoundment and in the sump to allow direct comparison of the fluids. Notify ADEQ Groundwater Protection Value Stream in accordance with Section 2.7.3(1) (Permit Violation and AL Status Reporting), and include in the notification an assessment of the type of water in the sump. Monitor fluid removal from the LCRS on a daily basis until the daily volume of fluid quantified remains below AL #1 for 30 days in order to minimize the hydraulic head on the lower liner.
2. Within 15 days of discovery, assess the condition of the liner system using visual methods for visible portions of the liner, electrical leak detection, or other methods as applicable to determine the location of leaks in the primary liner. If liner damage is evident, the permittee shall complete liner repairs and submit documentation of the repairs in the initial report discussed in Item No. 3 below.
3. Within 30 days of discovery of exceeding AL #1, the permittee shall submit an initial report to ADEQ Groundwater Protection Value Stream to address problems identified from the initial assessment of the liner system, the source of the fluid, and any remedial actions taken to minimize future occurrences. The report shall include the results of the initial liner evaluation, methods used to locate the leak(s) if applicable, any repair procedures implemented to restore the liner to optimal operational status if required, and other information necessary to ensure future occurrence of the incidence will be minimized. The permittee shall also submit the report required under Section 2.7.3.
4. For leakage rates that continue to exceed AL #1 and are below AL #2, a Liner Leakage Assessment Report shall be included in the next annual report described in Section 2.7.4 (Operational, Other or Miscellaneous Reporting) of this permit. The permittee may also submit the Liner Leakage Assessment Report to the ADEQ prior to the annual report due

date. This Liner Leakage Assessment Report shall be submitted to the ADEQ Groundwater Protection Value Stream.

5. ADEQ will review the Liner Leakage Assessment Report and may require that the permittee take additional action to address the problems identified from the assessment of the liner and perform other applicable repair procedures as directed by the ADEQ, including repair of the liner or addressing and controlling infiltration of non-operational water detected in the LCRS.

2.6.2.3 Exceedance of Alert Level #2 (Discharge Limit) for Liner Failure or Rips

If the Liner Leakage Discharge Limit (AL #2) specified in Section 4.1, Table 4.1-4, has been exceeded, the permittee shall:

1. Immediately cease all discharge to the impoundment and notify ADEQ's Groundwater Protection Value Stream orally, electronically, or by facsimile of the AL #2 exceedance. Within 24 hours, determine if water in the collection sump is process water from the impoundment by measuring the pH and conductivity of fluids contained in the impoundment and in the sump to allow direct comparison of the fluids.
2. Within 5 days of discovery, notify ADEQ Groundwater Protection Value Stream, in accordance with Section 2.7.3 (Permit Violation and AL Status Reporting) and include an assessment regarding the type of water in the sump based upon the measurements taken according to Item No. 1 listed above.
3. Within 15 days of discovery, identify the location of the leak(s) using visual methods, electrical leak detection, or other methods as applicable. If liner damage is evident, the permittee shall complete liner repairs and submit documentation of the repairs in Item No. 4 below. Discharge to the impoundment shall not be re-initiated until the leak(s) has been identified and repaired.
4. Within 30 days of exceeding AL #2, submit a report to ADEQ as specified in Section 2.7.3 (Permit Violation and AL Status Reporting). The report shall include the results of the initial liner evaluation, methods used to locate the leak(s) if applicable, any repair procedures and quality assurance/quality control implemented to restore the liner to optimal operational status if required, and other information necessary to ensure future occurrence of the incidence will be minimized. Upon review of the report, ADEQ may request additional monitoring or remedial actions.
5. If AL #2 continues to be exceeded following completion of repairs, submit for approval to ADEQ, a corrective action plan including a schedule to complete the corrective actions to address all problems identified from the assessment of the liner system and surface releases, if any, within 60 days of completion of repairs conducted in response to Item No. 3 above. Upon ADEQ's approval, the permittee shall implement the approved plan and schedule of corrective actions.
6. Within 30 days of completion of corrective actions, submit to ADEQ, a written report as specified in Section 2.6.6 (Corrective Actions)

2.6.2.4 Exceeding of Alert Levels in Groundwater Monitoring

Alert levels are listed in Attachment 15 for selected ISCR constituents for which numeric aquifer water quality standards have not been established. An exceedance of an AL for those constituents will be treated in the same manner as AL exceedances.

2.6.2.4.1 Alert Levels for Indicator Parameters

1. If an AL in Section 4.1 Table 4.1-6, 4.1-6B, 4.1-7, or Table 4.1-7B has been exceeded, the permittee shall request that the laboratory verify the sample results within 5 days. If the analysis does not confirm that an exceedance has occurred, no further action is required.
2. Within 5 days after receiving laboratory confirmation of an AL being exceeded, the permittee shall notify the ADEQ Groundwater Protection Value Stream and submit written confirmation within 30 days of receiving the laboratory confirmation of an AL exceedance.
3. If the results indicate an exceedance of an AL, the permittee shall conduct a verification sample of groundwater from the well within 15 days from laboratory confirmation. If the verification sample does not confirm that an exceedance has occurred, the permittee shall notify ADEQ Groundwater Protection Value Stream of the results. No further action is required under this subsection.
4. If verification sampling confirms that the AL has been exceeded, the permittee shall increase the frequency of monitoring to monthly and analyze for the entire list of parameters listed in Section 4.1, Table 4.1-6, or Table 4.1-6B, and increase the monitoring frequency to quarterly for parameters listed in Tables 4.1-7 or 4.1-7B. In addition, the permittee shall immediately investigate the cause of the exceedance and report the results of the investigation with the 30 day confirmation noted above. ADEQ may require additional investigations, the installation of additional wells, or corrective action in response to the report. The permittee shall continue monthly testing for the parameter(s) until the parameter(s) has remained below the AL for 3 consecutive monthly sampling events.

2.6.2.4.2 Alert Levels for Pollutants with Numeric Aquifer Water Quality Standards

1. If an AL for a pollutant set in Section 4.1, Table 4.1-6, 4.1-6B, 4.1-7, or Table 4.1-7B has been exceeded, the permittee may conduct verification sampling of the pollutant(s) that exceed their respective AL(s) within 5 days of becoming aware of an AL exceedance. The permittee may use the results of another sample taken between the date of the last sampling event and the date of receiving the result as verification.
2. If verification sampling confirms the AL exceedance or if the permittee opts not to perform verification sampling, then the permittee shall increase the frequency of monitoring to monthly of the pollutant(s) that exceed their respective AL(s). In addition, the permittee shall immediately initiate an investigation of the cause of the AL exceedance, including inspection of all discharging facilities and all related pollution control devices, review of any operational and maintenance practices that might have

resulted in an unexpected discharge, and hydrologic review of groundwater conditions including upgradient water quality from existing wells.

3. The permittee shall initiate actions identified in the approved contingency plan referenced in Section 3.0 and specific contingency measures identified in Section 2.6 to resolve any problems identified by the investigation which may have led to an AL exceedance. To implement any other corrective action the permittee shall obtain prior approval from ADEQ according to Section 2.6.6. Alternatively, the permittee may submit a technical demonstration, subject to written approval by the Groundwater Protection Value Stream, that although an AL is exceeded, the pollutant(s) that exceed their respective AL(s) are not reasonably expected to cause a violation of an AQL. The demonstration may propose a revised AL or monitoring frequency for approval in writing by the Groundwater Protection Value Stream.
4. Within 30 days after confirmation of an AL exceedance for those pollutant(s), the permittee shall submit the laboratory results to the Groundwater Protection Value Stream along with a summary of the findings of the investigation, the cause of the AL exceedance, and actions taken to resolve the problem.
5. Upon review of the submitted report, ADEQ may amend the permit to require additional monitoring, increased frequency of monitoring, or other actions.
6. The increased monitoring for those pollutant(s) required as a result of an AL exceedance may be reduced to the regularly scheduled frequency, if the results of three (3) sequential sampling events demonstrate that the parameter(s) does not exceed their respective AL(s).
7. If the increased monitoring required as a result of an AL exceedance for those pollutant(s) continues for more than six (6) sequential sampling events, the permittee shall submit a second report documenting an investigation of the continued AL exceedance within 30 days of the receipt of laboratory results of the sixth sampling event.

2.6.2.4.3 Alert Levels to Protect Downgradient Users from Pollutants Using a Narrative Aquifer Water Quality Standard

1. If an AL set for arsenic in Section 4.1, Table 4.1-6, or 4.1-7 has been exceeded, the permittee shall conduct verification sampling within 5 days of becoming aware of an AL exceedance.
2. If verification sampling confirms that the AL has been exceeded, the permittee shall investigate the cause of the exceedance and shall submit a report regarding the exceedance to ADEQ within 30 days of the date of verification sample. The report shall identify the cause and source(s) of the exceedance and shall propose actions to mitigate the exceedance. The report shall also present groundwater modeling to establish a projected relationship of the wells in which exceedance(s) were found and the downgradient boundary of the Arizona State Land Department property at the facility.

3. The permittee shall notify all downgradient users of the aquifer who may be directly affected by the discharge within 24 hours of receiving the results of verification confirmation sampling.

2.6.2.5 Exceeding of BADCT Alert Levels for Injection/Recovery Well Operation

The permittee shall initiate the following actions within 24 hours of becoming aware of an AL exceedance listed in Section 4.1, Table 4.1-8 for the loss of hydraulic control within the in-situ leaching area for more than 24 consecutive hours. A loss of hydraulic control occurs when the amount of fluids injected during a 24 hour period exceeds the amount of fluid recovered for the same 24 hour period. Loss of hydraulic control is also indicated by a less than 1-foot differential observed in any pair of observation and recovery wells over a 24 hour period. The permittee shall:

1. Notify the ADEQ Groundwater Protection Value Stream within one (1) day of becoming aware of the AL exceedance;
2. Adjust flow rates at injection/recovery wells until the recovery volume is greater than the injected volume;
3. Conduct an inspection, testing of piping and wellhead for leaks; injection and recovery lines, pumps, flow meters, totalizers, pressure gauges, pressure transducers, and other associated facilities;
4. Review of recent process logs, continuous chart recordings, meter readings, and other operational control information to identify any unusual occurrences;
5. Initiate pressure testing of the appropriate wells if the loss of fluids cannot be determined to be caused by a surface facility failure;
6. Repair system as necessary;
7. Within 1 week submit a report to ADEQ Groundwater Protection Value Stream. The report shall include but not be limited to providing the following information: a) injected volume in the period prior to the AL exceedance, b) recovered volume in the period prior to the AL exceedance, and c) corrective action taken.
8. The permittee is no longer considered to be in violation if the injection rate and recovery rates are re-established and maintained at normal operating conditions following the completion of the corrective actions.

If the exceedance of the AL is determined to be a result of a planned disruption or power outage, the cause will be noted in the logbook as required by Section 2.7.2.

If a leak is detected, operation of the well shall cease until the leak has been repaired and mechanical integrity demonstrated to minimize the potential for groundwater pollution.

Within 30 days of the initial AL exceedance caused by a leak, the permittee shall submit a report to ADEQ Groundwater Protection Value Stream at the address shown in Section 2.7.5. This report shall document all submittals to U.S. Environmental Protection Agency (USEPA), including

but not limited to, monitoring and report data and reports checking engineering and integrity of the well.

The facility is no longer on alert status once the operational indicator no longer indicates that an AL is being exceeded. The permittee shall, however, complete all tasks necessary to return the facility to its pre-alert operating condition.

2.6.2.6 Exceeding of Alert Levels Set for Maximum Injection Pressure

The permittee shall initiate the following actions within 24 hours of becoming aware of an AL exceedance listed in Section 4.1, Table 4.1-8 for the exceedance of a fracture gradient. The permittee shall:

1. Immediately investigate to determine the cause of the AL being exceeded, including:
 - a. Inspection, testing, and assessment of the current condition of all components of the injection system that may have contributed to the AL being exceeded, which may include taking the affected well(s) out of service;
 - b. Review of all data logger information, test results, and other operational control information to identify any unusual occurrences; and
 - c. Repair system as necessary.
2. Within 30 days of an AL being exceeded, the permittee shall submit the related data to the ADEQ Groundwater Protection Value Stream, along with a summary of the findings of the investigation, the cause of the AL being exceeded, and actions taken to resolve the problem. This report shall document all submittals to USEPA, including but not limited to, monitoring and report data, and reports checking engineering and integrity of the well.
3. Upon review of the submitted report, ADEQ may amend the permit to require additional monitoring, increased frequency of monitoring, amendments to permit conditions or other actions.
4. The facility is no longer on alert status once the operational indicator no longer indicates that an AL is being exceeded. The permittee shall, however, complete all tasks necessary to return the facility to its pre-alert operating condition.

2.6.2.7 Exceeding Alert Levels for Well Bore Electrical Conductivity

The permittee shall initiate the following actions within 24 hours of becoming aware of an AL exceedance listed in Section 4.1, Table 4.1-8 for the exceedance of Well Bore Electrical Conductivity. The permittee shall:

1. Verify the reading from the annular conductivity device to confirm there was an AL exceedance. If verification does not confirm an AL exceedance, the permittee can resume normal operations and notify the Groundwater Protection Value Stream in accordance with Section 2.7.3.

2. If verification confirms an AL exceedance, the permittee shall notify the ADEQ Groundwater Protection Value Stream within one (1) day of becoming aware of the AL exceedance.
3. Increase Well Bore Electrical Conductivity monitoring required in Table 4.1-8 to monthly.
4. Repair system as necessary.
5. Within 30 days of repairing the system, the permittee shall submit a written report to the Groundwater Protection Value Stream documenting the repair of the system and providing an evaluation of the cause, impacts, or mitigation any impacts to the LBFU, middle fine-grained unit and/or upper basin fill unit.

2.6.2.8 Exceeding Alert Levels for Fluid Electrical Conductivity

The permittee shall initiate the following actions within 24 hours of becoming aware of an AL exceedance listed in Section 4.1, Table 4.1-8 for the exceedance of fluid sample electrical conductivity. The permittee shall:

1. Immediately verify the fluid sample electrical conductivity. If the verification sample does not confirm that an exceedance has occurred, the permittee shall notify the ADEQ Groundwater Protection Value Stream of the results. No further action is required.
2. Within 24-hours of confirmation of an AL being exceeded, the permittee shall notify the ADEQ Groundwater Protection Value Stream and immediately investigate the cause of the exceedance.
3. The permittee shall report the results of the investigation within 30 days of confirmation. ADEQ may require reduction of injection rates and increase of pumping rates, additional investigations, the installation of additional wells, or corrective action in response to the report.

2.6.2.9 Exceeding an Alert Level for Cone of Depression

The permittee shall initiate the following actions within 24 hours of becoming aware of an Alert Level exceedance listed in Section 4.1, Table 4.1-8 for the cone of depression. The permittee shall:

1. Within 48 hours of becoming aware of the AL exceedance, verify whether an exceedance has occurred by completing the following:
 - a. Evaluate whether the data collection protocols have been properly followed.
 - b. Review field notes for indications of unusual circumstances that may have occurred during the collection of the data.
 - c. Review daily injection and pumping values at the ISCR well field at the time of the measurements to confirm that extraction was greater than injection during that period in accordance with Section 2.7.4.4(2), Table 4.1-1, and Table 4.1-8.
 - d. Evaluate the pumping conditions at other nearby wells during the time of

- measurements (i.e., were POC or other wells being purged).
- e. Inspect the equipment used to collect the field measurements.
 - f. Determine if the measurement equipment was different from past collection periods and evaluate the potential effects of differences between the equipment used.
 - g. Check the calibration of the equipment used (water sounder, pressure transducers, etc.).
2. If an exceedance is not verified, the permittee shall notify the ADEQ Groundwater Protection Value Stream of the results of the verification. No further action is required.
 3. If an exceedance is verified, the permittee shall:
 - a. Reduce the injection rate and increase the pumping rate at the recovery wells to a rate that will cause the cone of depression to no longer exceed the AL and notify ADEQ Groundwater Protection Value Stream within 24 hours.
 - b. Increase the frequency of potentiometric surface map compilation to weekly until water level measurements confirm that the cone of depression AL is no longer exceeded.
 - c. If the cone of depression does not meet the AL after a period of 30 days of reduced injection and increased pumping, the permittee shall immediately cease injecting solutions, continue extracting until the cone of depression no longer exceeds the AL, increase the frequency of Level 1 monitoring to monthly, and increase the frequency of monitoring the Level 2 parameters to quarterly at all of the nearest down gradient POC wells. Upon taking these actions, the permittee shall notify ADEQ Groundwater Protection Value Stream within 3 days.
 4. Once the AL is no longer exceeded, the permittee shall prepare a summary report to be submitted to the Groundwater Protection Value Stream within 30 days summarizing the findings and actions taken to extend the cone of depression to the Pollutant Management Area boundary.

2.6.3 Discharge Limitations Violations

2.6.3.1 Liner Failure, Containment Structure Failure, or Unexpected Loss of Fluid

In the event of overtopping, liner failure, containment structure failure, or unexpected loss of fluid as described in Section 2.3, the permittee shall take the following actions:

1. As soon as practicable, cease all discharges as necessary to prevent any further releases to the environment.
2. Within 24 hours of discovery, notify ADEQ Groundwater Protection Value Stream, orally, electronically, or by facsimile.
3. Within 24 hours of discovery of a failure that resulted in a release to the subsurface, collect representative samples of the fluid remaining in affected impoundments and drainage structures, analyze sample(s) according to Section 4.1, Table 4.1-2C and report

in accordance with Section 2.7.3 (Permit Violation and AL Status Reporting). In the 30-day report required under Section 2.7.3, include a copy of the analytical results and forward the report to ADEQ Groundwater Protection Value Stream.

4. Within 15 days of discovery, initiate an evaluation to determine the cause for the incident. Identify the circumstances that resulted in the failure and assess the condition of the discharging facility and liner system. Implement corrective actions as necessary to resolve the problems identified in the evaluation. Initiate repairs to any failed liner, system, structure, or other component as needed to restore proper functioning of the discharging facility. The permittee shall not resume discharging to the discharging facility until repairs of any failed liner or structure are performed. Repair procedures, methods, and materials used to restore the system(s) to proper operating condition shall be described in the facility log/recordkeeping file and available for ADEQ review.
5. Record in the facility log/recordkeeping file the amount of fluid removed, a description of the removal method, and other disposal arrangements. The facility log/recordkeeping file shall be maintained according to Section 2.7.2 (Operation Inspection/Log/Recordkeeping File).
6. Within 30 days of discovery of the incident, submit a report to ADEQ as specified in Section 2.7.3. Include a description of the actions performed in Subsections 1 through 5 listed above. Upon review of the report, ADEQ may request additional monitoring or remedial actions.
7. Within 60 days of discovery, conduct an assessment of the impacts to the subsoil and/or groundwater resulting from the incident. This assessment may include the installation of POC(s) to determine down-gradient groundwater impact from the incident along with commencement of groundwater monitoring per Section 4.1, Table 4.1-7. If soil or groundwater is impacted such that it could or did cause or contribute to an exceedance of an AQL at the applicable point of compliance, submit to ADEQ for approval, a corrective action plan to address such impacts, including identification of remedial actions and a schedule for completion of activities. At the approval of ADEQ, the permittee shall implement the approved plan.
8. Within 30 days of completion of corrective actions, submit to ADEQ, a written report as specified in Section 2.6.6 (Corrective Actions).
9. Upon review of the report, ADEQ may amend the permit to require additional monitoring, increased frequency of monitoring, amendments to permit conditions, or other actions.

2.6.3.2 Overtopping of a Surface Impoundment

If overtopping of fluid from a permitted surface impoundment occurs, and results in an unauthorized discharge pursuant to A.R.S. § 49-201(12), the permittee shall:

1. As soon as practicable, cease all discharges to the surface impoundment to prevent any further releases to the environment.
2. Within 24 hours of discovery, notify ADEQ Groundwater Protection Value Stream.

3. Within 24 hours, collect representative samples of the fluid contained in the surface impoundment. Samples shall be analyzed for the parameters specified in Section 4.1, Table 4.1-2C. Within 30 days of the incident, submit a copy of the analytical results to ADEQ Groundwater Protection Value Stream.
4. As soon as practicable, remove and properly dispose of excess water in the impoundment until the water level is restored at or below the appropriate freeboard as described in Section 4.1, Table 4.1-3. Record in the facility log the amount of fluid removed, a description of the removal method, and the disposal arrangements. The facility log/recordkeeping file shall be maintained according to Section 2.7.2 (Operation Inspection/Logbook/Recordkeeping File).
5. Within 30 days of discovery, evaluate the cause of the overtopping and identify the circumstances that resulted in the incident. Implement corrective actions and adjust operational conditions as necessary to resolve the problems identified in the evaluation. Repair any systems as necessary to prevent future occurrences of overtopping.
6. Within 30 days of discovery of overtopping, submit a report to ADEQ as specified in Section 2.7.3.2 (Permit Violation and Alert Level Status Reporting). Include a description of the actions performed in Subsections 1 through 5 listed above. Upon review of the report, ADEQ may request additional monitoring or remedial actions.
7. Within 60 days of discovery, and based on sampling in Subsection 3 above, conduct an assessment of the impacts to the subsoil and/or groundwater resulting from the incident.
8. If soil or groundwater is impacted such that it could cause or contribute to an exceedance of an AQL at the applicable point of compliance, submit to ADEQ for approval a corrective action plan to address such impacts, including identification of remedial actions and/or monitoring, and a schedule for completion of activities. At the direction of ADEQ, the permittee shall implement the approved plan.
9. Within 30 days of completion of corrective actions, submit to ADEQ a written report as specified in Section 2.6.6 (Corrective Actions). Upon review of the report, ADEQ may amend the permit to require additional monitoring, increased frequency of monitoring, amendments to permit conditions, or other actions.

2.6.3.3 Inflows of Unexpected Materials to a Surface Impoundment

The types of materials that are expected to be placed in the permitted surface impoundments are specified in Section 2.3 (Discharge Limitations). If any unexpected materials flow to a permitted surface impoundment, the permittee shall:

1. As soon as practicable, cease all unexpected inflows to the surface impoundment(s).
2. Within 24-hours of discovery, notify ADEQ Groundwater Protection Value Stream.
3. Within five (5) days of the incident, identify the source of the material and determine the cause for the inflow. Characterize the unexpected material and contents of the affected impoundment, and evaluate the volume and concentration of the material to determine if it is compatible with the surface impoundment liner. Based on the

evaluation of the incident, repair any systems or equipment and/or adjust operations as necessary to prevent future occurrences of inflows of unexpected materials.

4. Within 30 days of an inflow of unexpected materials, submit a report to ADEQ as specified in Section 2.7.3.2 (Permit Violation and Alert Level Status Reporting). Include a description of the actions performed in Subsections 1 through 3 listed above.
5. Upon review of the report, ADEQ may amend the permit to require additional monitoring, increased frequency of monitoring, amendments to permit conditions, or other actions including remediation.

2.6.3.4 Unexpected Loss of Fluid in the Injection/Recovery Wells at the Well Field

In the event of an unexpected loss of fluid in the injection/recovery wells, such that there is an unauthorized discharge of fluids pursuant to A.R.S. § 49-201(12), the permittee shall:

1. Within 2 hours of discovery cease injection in the affected area and/or adjust flow rates at injection/recovery wells until an inward hydraulic gradient is reestablished and excess ISCR solutions are recovered necessary to prevent further releases to the environment.
2. Operate the recovery wells in the affected area until the amount of fluid recovered is in excess of the amount of fluid injected during the 24 hour period.
3. Within 24 hours of discovery, notify ADEQ Groundwater Protection Value Stream.
4. Inspect relevant components such as injection, recovery lines, pumps, flow meters, flow totalizers, pressure gauges, pressure transducers, and other associated facilities.
5. Verify proper operations of all facilities within the in-situ leach area.
6. Within 24 hours of discovery, initiate an evaluation to determine the cause for the incident. Identify the circumstances that resulted in the failure and assess the condition of the well. Implement corrective actions as necessary to resolve the problems identified in the evaluation. Initiate repairs to any system, structure, or other component as needed to restore proper functioning of the well. The permittee shall not resume injecting or discharging until repairs of any failed structure are performed and tested as applicable. Repair procedures, methods, and materials used to restore the system(s) to proper operating condition shall be described in the facility log/recordkeeping file and available for ADEQ review. The facility log/recordkeeping file shall be maintained according to Section 2.7.2 (Operation Inspection / Log / Recordkeeping File).
7. Submit a written report within 30 days to ADEQ as specified in Section 2.7.3 (Permit Violation and AL Status Reporting) describing the incident and the corrective actions taken. Upon review of the report, ADEQ may require an amendment to the permit to require surface, vadose zone or groundwater monitoring, require installation of additional POCs, increased frequency of monitoring, remedial actions, amendments to permit conditions, or other actions.
8. Within 30 days of discovery, conduct an assessment of the impacts to the surface, vadose zone and/or groundwater resulting from the incident. If soil or groundwater is

impacted, submit to ADEQ, for approval, a corrective action plan to address such impacts, including identification of remedial actions and/or monitoring, and a schedule for completion of activities. The corrective action plan shall be submitted within 60 days of the incident. At the direction of ADEQ, the permittee shall implement the approved plan.

2.6.4 Aquifer Quality Limit Violation

1. If an AQL for a pollutant specified in Section 4.1, Table 4.1-6, and Table 4.1-7 is exceeded in a POC well, the permittee may conduct verification sampling for those pollutant(s) that were above their respective AQL(s) no later than five (5) days after learning of the violation. If verification sampling does not verify the violation, then the initial violation shall be reported in the Quarterly Monitoring and Compliance Report and no further action shall be required of the permittee for that event.
2. If verification sampling confirms the violation for those pollutant(s) that were above their respective AQL(s), or if the permittee opts not to perform verification sampling, then the permittee shall:
 - a. Notify ADEQ within five (5) days after confirming or learning of the violation, in accordance with Section 2.7.3;
 - b. Immediately initiate: (1) a BADCT systems evaluation for the cause of the violation, including an inspection of all facilities regulated under this permit and corresponding pollution control devices, and a review of any operational or maintenance practices that might have resulted in an unexpected discharge; and (2) a hydrogeologic assessment of the violation, including groundwater modeling, review of groundwater conditions and upgradient water quality, groundwater contours, and an inventory of downgradient well users and types of uses;
 - c. Increase the frequency of monitoring at the location of the violation to monthly for those pollutant(s) that exceeded their respective AQL(s);
 - d. Submit a written report based on the investigation within thirty (30) days after becoming aware of the violation, in accordance with Section 2.7.3; and
 - e. Take actions that may be necessary as a result of the violation under Section 2.6.5.
3. As part of its written report, the permittee may include a technical demonstration that the violation was not caused or contributed to by pollutants discharged from a facility regulated under this APP.
4. Based on the written report, ADEQ may, if necessary: (1) amend the permit to require increased frequency of monitoring or additional monitoring; and (2) authorize corrective action including measures to control the source of a discharge causing the violation (including BADCT correction if necessary); remediate affected soils, surface water or groundwater; and mitigate the impact of the violation on existing uses of the aquifer. ADEQ's corrective action authorization may be in the form of an approval under Section 2.6.6, an amendment of this permit or approval of a contingency plan.
5. If the violation continues for sixty (60) days, then the permittee shall notify downgradient or downstream users who may be directly affected by the violation.

6. If the violation continues for ninety (90) days, then the permittee shall prepare and submit for ADEQ approval a hydrogeologic investigation work plan within thirty (30) after receiving the laboratory results of the third sampling event. The work plan shall assess whether the violation is due to natural or anthropogenic causes and, if exceeded values are found to be related to APP-regulated facilities within the mine site or results are inconclusive, the nature and extent of the discharge. This hydrogeologic investigation shall become the basis of adjusting permit conditions and/or designing corrective action.

2.6.5 Emergency Response and Contingency Requirements for Unauthorized Discharges pursuant to A.R.S. §49-201(12) and pursuant to A.R.S. § 49-241

2.6.5.1 Duty to Respond

The permittee shall act immediately to correct any condition resulting from a discharge pursuant to A.R.S. § 49-201(12) if that condition could pose an imminent and substantial endangerment to public health or the environment.

2.6.5.2 Discharge of Hazardous Substances or Toxic Pollutants

In the event of any unauthorized discharge pursuant to A.R.S. § 49-201(12) of suspected hazardous substances (A.R.S. § 49-201(19)) or toxic pollutants (A.R.S. § 49-243(I)) on the facility site, the permittee shall promptly isolate the area and attempt to identify the discharged material. The permittee shall record information, including name, nature of exposure, and follow-up medical treatment, if necessary, on persons who may have been exposed during the incident. The permittee shall notify the Groundwater Protection Value Stream within 24 hours upon discovering the discharge of hazardous material which (a) has the potential to cause an AQL to be exceeded, or (b) could pose an endangerment to public health or the environment.

2.6.5.3 Discharge of Non-hazardous Materials

In the event of any unauthorized discharge pursuant to A.R.S. § 49-201(12) of non-hazardous materials from the facility, the permittee shall promptly attempt to cease the discharge and isolate the discharged material. Discharged material shall be removed and the site cleaned up as soon as possible. The permittee shall notify the ADEQ Groundwater Protection Value Stream within 24 hours upon discovering the discharge of non-hazardous material which (a) has the potential to cause an AQL to be exceeded, or (b) could pose an endangerment to public health or the environment.

2.6.5.4 Reporting Requirements

The permittee shall submit a written report for any unauthorized discharges reported under Sections 2.6.5.2 and 2.6.5.3 to ADEQ Groundwater Protection Value Stream within 30 days of the discharge or as required by subsequent ADEQ action. The report shall summarize the event, including any human exposure and facility response activities, and include all information specified in Section 2.7.3. If a notice is issued by ADEQ subsequent to the discharge notification,

any additional information requested in the notice shall also be submitted within the time frame specified in that notice. Upon review of the submitted report, ADEQ may require additional monitoring or corrective actions.

2.6.6 Corrective Actions

Specific contingency measures identified in Section 2.6 and actions identified in the approved contingency plan to be submitted under the Compliance Schedule Section 3.0 have already been approved by ADEQ and do not require written approval to implement.

With the exception of emergency response actions taken under Section 2.6.5, the permittee shall obtain written approval from the Groundwater Protection Value Stream prior to implementing a corrective action to accomplish any of the following goals in response to exceeding an AL or violation of an AQL, DL, or other permit condition:

1. Control of the source of an unauthorized discharge;
2. Soil cleanup;
3. Cleanup of affected surface waters;
4. Cleanup of affected parts of the aquifer; and/or
5. Mitigation to limit the impact of pollutants on existing uses of the aquifer.

Within 30 days of completion of any corrective action, the permittee shall submit to the ADEQ Groundwater Protection Value Stream a written report describing the causes, impacts, and actions taken to resolve the problem.

EXHIBIT D-7

**Discharge Limitations, Monitoring Requirements, and
Alert Levels
(Revised March 19, 2021)**

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Appendix 1 – Monitoring Tables

1.1 Introduction

Florence Copper Inc. (Florence Copper) has prepared this document to provide information regarding proposed discharge limitations, monitoring requirements, alert levels (AL), compliance schedules, and temporary cessation or related plans. Accordingly, this document includes information that describes discharge limitations, monitoring requirements, ALs, compliance schedules, and temporary cessation plans proposed by Florence Copper.

1.2 Discharge Limitations

Florence Copper proposes the following discharge limitations:

1. The permittee shall operate and maintain all permitted facilities to prevent unauthorized discharges pursuant to Arizona Revised Statutes § 49-201(12) resulting from failure or bypassing of Best Available Demonstrated Control Technology pollutant control technologies including liner failure, uncontrollable leakage, berm breaches that result in an unexpected loss of fluid, accidental spills, or other unauthorized discharges. Liner failure in a single-lined impoundment is any condition that would result in leakage exceeding 550 gallons per day per acre of the impoundment.
2. Injection of lixiviant will not be conducted until all core holes and wells within 500 feet of an injection or recovery well located in the In-Situ Copper Recovery wellfield have been abandoned in accordance with the Plugging and Abandonment Plan included as Attachment E of the Underground Injection Control (UIC) Permit application.
3. Florence Copper will initiate contingency actions identified in Aquifer Protection Permit (APP) No. P-101704 if process solution sampling data show that the polynuclear aromatic hydrocarbon concentration in the lixiviant exceeds 20 milligrams per liter (mg/L) in any monthly sample, or 10 mg/L as a quarterly average.

1.3 Monitoring Activities

This section describes monitoring activities that are designed to provide an early detection and prompt response to any condition that might result in an unauthorized discharge to an aquifer or to the vadose zone, or that might cause a violation of an Aquifer Water Quality Standard (AWQS) at a Point of Compliance (POC) well, or cause concentrations of discharge constituents to increase at a POC well if the pre-operational concentrations of those constituents exceed AWQS. The activities include groundwater and facility/operational monitoring.

1.3.1 Monitoring and Analytical Requirements

All monitoring required under the APP and UIC permits will continue for the duration of the permits except as conducted in accordance with a temporary cessation plan approved by the U.S. Environmental Protection Agency (USEPA) and the Arizona Department of Environmental Quality (ADEQ). All sampling, preservation, and holding times will be in accordance with currently accepted standards of professional practice. Trip blanks, equipment blanks, and duplicate samples will also be obtained and chain-of-custody procedures will be followed, in accordance with currently accepted standards of professional practice. Florence Copper will consult with the USEPA Code of Federal Regulations for guidance in this regard. Copies of laboratory analyses and chain-of-custody forms will be maintained at the permitted facility. Upon request, these documents will be made immediately available for review by the USEPA and ADEQ personnel.

All samples collected for compliance monitoring at the POC wells will be analyzed using Arizona and USEPA approved methods. Regardless of the method used, the detection limits will be sufficient to determine compliance with the regulatory limits of the parameters specified in the UIC Permit. Analyses will be performed by a laboratory licensed by the Arizona Department of Health Services, Office of Laboratory Licensure and Certification. For results to be considered valid, all analytical work will meet quality control standards specified in the approved methods. A list of Arizona state-certified laboratories can be obtained at the address below:

Arizona Department of Health Services
Office of Laboratory Licensure and Certification
150 North 18 Avenue
Phoenix, AZ 85007
Phone: (602) 542-1025

Monitoring equipment required by the APP and UIC permits will be installed and maintained so that representative samples required by the permits can be collected. If new groundwater wells are determined to be necessary, the construction details will be submitted to the USEPA and ADEQ for approval prior to installation, and the APP and the UIC Permit shall be amended to include any new monitoring points.

1.3.2 Groundwater Monitoring Sampling Protocols

The following describes the protocols that will be used for the collection and analysis of groundwater samples collected from the designated POC wells listed in Tables 13 and 14 of APP No. P-101704, fault monitoring wells, Underground Source of Drinking Water (USDW) monitoring wells, and annular conductivity device (ACD) demonstration wells listed on Tables 13.1 and 14.1 provided with this Exhibit. Tables 13, 13.1, 14, and 14.1 are included in Appendix 1 of this Exhibit.

The protocols will be used for collecting and analyzing samples from POC wells for which ALs and Aquifer Quality Limits (AQL) have been established, and for collecting and analyzing groundwater samples for the purpose of developing groundwater quality data needed for the establishment of ALs and AQLs. ALs and/or AQLs have been previously established for all of the POC wells listed in Tables 13 and 14, except replacement wells M32-UBF and M33-UBF. ALs and AQLs have not yet been established for the fault monitoring wells, USDW monitoring wells, and ACD demonstration wells listed in Tables 13.1 and 14.1.

Static water levels will be measured and recorded prior to sampling. Wells will be purged of at least three borehole volumes (as calculated using the static water level) or until field parameters (pH, temperature, and conductivity) are stable, whichever represents the greater volume. If evacuation results in the well going dry, the well will be allowed to recover to 80 percent of the original borehole volume, or for 24 hours, whichever is shorter, prior to sampling. If after 24 hours there is not sufficient water for sampling, the well will be recorded as “dry” for the monitoring event. An explanation for reduced pumping volumes, a record of the volume pumped, and modified sampling procedures will be reported and submitted with the quarterly report.

Florence Copper may conduct the sampling using the low-flow purging method as described in the Arizona Department of Water Resources Research Center, March 1995 Field Manual for Water Quality Sampling. If the low-flow sampling method is used, the well will be purged until indicator parameters

stabilize. Indicator parameters will include dissolved oxygen, turbidity, pH, temperature, and conductivity.

1.3.3 Existing ALs and AQLs

Tables 13, 13.1, 14, and 14.1 (Appendix 1) list parameters that are to be monitored quarterly and annually at each POC well during the period of the permit. ALs and/or AQLs have been previously established for all of the POC wells listed in Tables 13 and 14, except replacement wells M32-UBF and M33-UBF. Florence Copper will use the procedure set forth in APP No. P-101704 to calculate the ALs and/or AQLs for POC wells M32-UBF, M33-UBF, fault monitoring wells, USDW monitoring wells, and ACD demonstration wells listed in Tables 13.1 and 14.1. The locations of each of the POC wells, fault monitoring wells, USDW monitoring wells, and ACD demonstration wells are provided in Table D-7.1.

1.3.4 New ALs and AQLs

New ALs and AQLs will be established and calculated using the method set forth in APP No. P-101704. The procedure is provided below.

1.3.4.1 New ALs

ALs shall be calculated for all contaminants with an established numeric AWQS for any new or replacement POC wells, fault monitoring wells, USDW monitoring wells, and ACD demonstration wells unless otherwise specified in the APP or UIC Permit.

The permittee shall submit the ambient groundwater data in tabulated form to the ADEQ and USEPA for review. Copies of all laboratory analytical reports, field notes, and the Quality Assurance/Quality Control (QA/QC) procedures used in collection and analyses of the samples for all parameters listed in Tables 13, 13.1, 14, and 14.1 to be established for each POC well, fault monitoring wells, USDW monitoring wells, and ACD demonstration wells shall be submitted to the ADEQ and USEPA. The permittee may submit a report with the calculations for each AL and AQL included in the permit for review and approval by the ADEQ and USEPA, or the permittee may defer calculation of the ALs and AQLs by the ADEQ. The ALs shall be established and calculated following acceptable statistical guidance such as the *USEPA Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities Unified Guidance* (EPA 530-R-09-007).

The following criteria shall be met in establishing ALs in the permit:

1. The AL shall be calculated for a parameter using the analyses from a minimum of eight sampling events.
2. Any data where the laboratory Practical Quantitation Limit (PQL) exceeds 80 percent of the AWQS shall not be included in the AL calculation.
3. If a parameter is below the detection limit, the permittee must report the value as “less than” the numeric value for the PQL or detection limit for the parameter, not just as “non-detect.” For those parameters, the permittee shall use a value of one-half the reported detection limit for the AL calculation.
4. If the analytical results from more than 50 percent of the samples for a specific parameter are non-detect, then the AL shall be set at 80 percent of the AWQS.

5. If the calculated AL for a specific constituent and well is less than 80 percent of the AWQS, the AL shall be set at 80 percent of the AWQS for that constituent in that well.

1.3.4.2 New AQLs

For each of the monitored analytes for which a numeric AWQS has been adopted, the AQL shall be established as follows:

1. If the calculated AL is less than the AWQS, then the AQL shall be set equal to the AWQS.
2. If the calculated AL is greater than the AWQS, then the AQL shall be set equal to the calculated AL value, and no AL shall be set for that constituent at that monitoring point.

1.3.5 Replacement Monitoring Wells

In the event that one or more of the designated POC wells, fault monitoring wells, USDW monitoring wells, and ACD demonstration wells should become unusable or inaccessible due to damage or any other event, a replacement well will be constructed and installed upon approval by the USEPA and ADEQ. If the replacement well is 50 feet or less from the original well, the ALs and/or AQLs calculated for the designated POC well will apply to the replacement well.

1.3.6 Compliance Monitoring

Florence Copper will begin compliance monitoring at the designated POC wells once applicable ALs and/or AQLs have been established. Florence Copper will continue to monitor each well listed in Tables 13, 13.1, 14, and 14.1 in accordance with the parameters and frequencies listed in those Tables. If monitoring indicates that an AL or AQL have been exceeded, Florence Copper will follow the requirements outlined in Section 2.6.2.5 of APP No. P-101704, and applicable sections of the UIC Permit. The results of compliance monitoring will be documented and submitted with the quarterly report to the USEPA and ADEQ.

1.3.7 Facility/Operational Monitoring

1.3.7.1 Facility Monitoring

Exhibit D-2 of Attachment D (Operations Plan) of the UIC Application lists facility components that will be monitored to maintain normal operations. Many of the components listed will be equipped with electronic monitors and automatic shutoffs. Conditions requiring initiation of the contingency plan are described in Exhibit D-2 of Attachment D of this Application.

1.4 Temporary Cessation

Florence Copper will give written notice to the USEPA and ADEQ before ceasing operation of the facility for a period of 60 days or greater. At the time of notification, Florence Copper will submit for USEPA and ADEQ approval a plan for maintenance of discharge control systems and for monitoring during the period of temporary cessation. Immediately following USEPA and ADEQ approval, Florence Copper will implement the approved plan. If necessary, the USEPA and ADEQ will amend the APP and UIC permits conditions to incorporate conditions to address temporary cessation. During the period of temporary cessation, Florence Copper will provide written notice to the USEPA and ADEQ of the operational status of the facility every 2 years. If Florence Copper intends to permanently cease operation of any facility, Florence Copper will submit written notification of closure to the USEPA and ADEQ in accordance with permit conditions.

APPENDIX 1
Monitoring Tables

TABLE D-7.1
WELL LOCATIONS
 FLORENCE COPPER INC.
 FLORENCE, ARIZONA

Well Name	Well Type	Latitude	Longitude
M66-UBF	USDW Monitoring Well	33.04543959	-111.4358553
M67-LBF	USDW Monitoring Well	33.04563265	-111.4359356
M68-LBF	USDW Monitoring Well	33.04853376	-111.4363396
M69-UBF	USDW Monitoring Well	33.04866895	-111.436342
M70-LBF	USDW Monitoring Well	33.05266331	-111.4366228
M71-UBF	USDW Monitoring Well	33.05281577	-111.4366078
M72-UBF	ACD Demonstration Well	33.05086431	-111.4347419
M73-LBF	ACD Demonstration Well	33.05086351	-111.4345365
M62-LBF	Fault Monitoring Well	33.05434192	-111.433434
M63-LBF	Fault Monitoring Well	33.05390093	-111.4273522
M64-LBF	Fault Monitoring Well	33.04915383	-111.4246236
M65-LBF	Fault Monitoring Well	33.04398948	-111.4310261
M75-UBF	Fault Monitoring Well	33.04926807	-111.4247445
M74-O	Fault Monitoring Well	33.04903477	-111.4244877
M77-UBF	Fault Monitoring Well	33.04421236	-111.4310539
M76-O	Fault Monitoring Well	33.04383021	-111.431056
M52-UBF	Point of Compliance Well	33.05292796	-111.4235828
M7-GL	Point of Compliance Well	33.0541719	-111.4367234
M8-O	Point of Compliance Well	33.05415471	-111.4369024
M3-GL	Point of Compliance Well	33.04350051	-111.42248
M4-O	Point of Compliance Well	33.04354048	-111.4225521
M1-GL	Point of Compliance Well	33.04392337	-111.432538
M18-GU	Point of Compliance Well	33.0439299	-111.4327246
M15-GU	Point of Compliance Well	33.05111382	-111.4379257
M2-GU	Point of Compliance Well	33.04363807	-111.4223873
M6-GU	Point of Compliance Well	33.05424399	-111.4367902
O19-GL	Point of Compliance Well	33.05367077	-111.4336038
P19-1-O	Point of Compliance Well	33.05359733	-111.4331701
M14-GL	Point of Compliance Well	33.05111101	-111.4377726
P49-O	Point of Compliance Well	33.04507134	-111.4355847
M21-UBF	Point of Compliance Well	33.05351268	-111.4312728
M23-UBF	Point of Compliance Well	33.05130893	-111.4377835
M25-UBF	Point of Compliance Well	33.04839948	-111.4375655
M30-O	Point of Compliance Well	33.05357994	-111.428885
M27-LBF	Point of Compliance Well	33.05447667	-111.4352545
M19-LBF	Point of Compliance Well	33.05360667	-111.4312012
M29-UBF	Point of Compliance Well	33.05459845	-111.4350118
M22-O	Point of Compliance Well	33.051273	-111.4376374
M24-O	Point of Compliance Well	33.04829271	-111.4375855
M26-O	Point of Compliance Well	33.05445396	-111.4350427
M28-LBF	Point of Compliance Well	33.0546082	-111.4351729
M31-LBF	Point of Compliance Well	33.05356137	-111.4290361
M17-GL	Point of Compliance Well	33.0471846	-111.4375671
M16-GU(R)	Point of Compliance Well	33.04730129	-111.4373254
O49-GL(R)	Point of Compliance Well	33.04505778	-111.4362073
M20-O	Point of Compliance Well	33.05361718	-111.4313524
M33-UBF	Point of Compliance Well	33.05202471	-111.4176937
M32-UBF	Point of Compliance Well	33.04839792	-111.4195207

TABLE 13
QUARTERLY GROUNDWATER COMPLIANCE MONITORING
FLORENCE COPPER INC.
FLORENCE, ARIZONA

Parameter	M1-GL		M2-GU		M3-GL		M4-O		M6-GU		M7-GL		M8-O		M14-GL		M15-GU	
	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)
Depth to Groundwater (ft. bgs)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Water Level Elevation (ft amsl)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Indicator Parameters ¹ :																		
pH (field) (S.U.)	Monitor ²	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Specific Conductance (field) (mhos/cm)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Temperature (field)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Fluoride	4.0	3.2	4.0	3.2	4.0	3.2	5.1	Monitor	4.0	3.2	4.0	3.2	4.0	3.6	4.0	3.2	4.0	3.2
Magnesium	NE ³	31	NE	39	NE	36	NE	15	NE	44	NE	1.0	NE	1	NE	23	NE	21
Sulfate	NE	184.2	NE	275	NE	187	NE	405	NE	86	NE	82	NE	122	NE	144	NE	89
Total dissolved solids	NE	1028	NE	1496	NE	1157	NE	1072	NE	620	NE	464	NE	609	NE	874	NE	794

Notes:

¹ Metals must be analyzed as dissolved metals.

² Monitor = Monitoring required, but no aquifer quality limit (AQL) or alert level (AL) will be established in the permit.

³ NE = Not Established

⁴ Reserved - AQL/Als pending ambient monitoring being performed per Section 2.5.3.2 and the CSI requirements.

mhos/cm = millimhos per centimeter

amsl = above mean sea level

bgs = below ground surface

mg/L = milligrams per liter

S.U. = standard unit

TABLE 13
QUARTERLY GROUNDWATER COMPLIANCE MONITORING
FLORENCE COPPER INC.
FLORENCE, ARIZONA

Parameter	M16-GU(R)		M17-GL		M18-GU		M19-LBF		M20-O (R)		M21-UBF		M22-0		M23-UBF		M24-0	
	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)
Depth to Groundwater (ft. bgs)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Water Level Elevation (ft amsl)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Indicator Parameters ¹ :																		
pH (field) (S.U.)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Specific Conductance (field) (mhos/cm)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Temperature (field)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Fluoride	4.0	3.2	4.0	3.2	4.0	3.2	4.0	3.2	4.0	3.2	4.0	3.2	4.0	3.2	4.0	3.2	4.0	3.2
Magnesium	NE	14	NE	9.3	NE	8.6	NE	21	NE	14	NE	87	NE	8.6	NE	69	NE	19
Sulfate	NE	112	NE	209	NE	86	NE	89	NE	112	NE	487	NE	86	NE	411	NE	1364
Total dissolved solids	NE	809	NE	831	NE	1094	NE	794	NE	809	NE	2867	NE	1094	NE	2392	NE	2363

Notes:

¹ Metals must be analyzed as dissolved metals.

² Monitor = Monitoring required, but no aquifer quality limit (AQL) or alert level (AL) will be established in the permit.

³ NE = Not Established

⁴ Reserved - AQL/Als pending ambient monitoring being performed per Section 2.5.3.2 and the CSI requirements.

mhos/cm = millimhos per centimeter

amsl = above mean sea level

bgs = below ground surface

mg/L = milligrams per liter

S.U. = standard unit

TABLE 13
QUARTERLY GROUNDWATER COMPLIANCE MONITORING
FLORENCE COPPER INC.
FLORENCE, ARIZONA

Parameter	M25-UBF		M26-0		M27-LBF		M28-LBF		M29-UBF		M30-0		M31-UBF		O19-GL		O49-GL(R)	
	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)
Depth to Groundwater (ft. bgs)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Water Level Elevation (ft amsl)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Indicator Parameters ¹ :																		
pH (field) (S.U.)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Specific Conductance (field) (mhos/cm)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Temperature (field)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Fluoride	4.0	3.2	4.0	3.4	4.0	3.2	4.0	3.2	4.0	3.2	4.0	3.2	4.0	3.2	4.0	3.2	4.0	3.2
Magnesium	NE	76	NE	1.0	NE	51	NE	2.6	NE	84	NE	18	NE	NE	NE	17	NE	18
Sulfate	NE	387	NE	105	NE	179	NE	81	NE	456	NE	102	NE	330	NE	99	NE	181
Total dissolved solids	NE	2683	NE	556	NE	1745	NE	610	NE	2751	NE	824	NE	NE	NE	770	NE	849

Notes:

¹ Metals must be analyzed as dissolved metals.

² Monitor = Monitoring required, but no aquifer quality limit (AQL) or alert level (AL) will be established in the permit.

³ NE = Not Established

⁴ Reserved - AQL/Als pending ambient monitoring being performed per Section 2.5.3.2 and the CSI requirements.

mhos/cm = millimhos per centimeter

amsl = above mean sea level

bgs = below ground surface

mg/L = milligrams per liter

S.U. = standard unit

TABLE 13
QUARTERLY GROUNDWATER COMPLIANCE MONITORING
FLORENCE COPPER INC.
FLORENCE, ARIZONA

Parameter	P19-1-0		P49-O		M52-UBF (M32-UBF replacement)		M54-LBF		M54-O		M33-UBF (replacement)	
	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)
Depth to Groundwater (ft. bgs)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Water Level Elevation (ft amsl)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Indicator Parameters ¹ :												
pH (field) (S.U.)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Specific Conductance (field) (mhos/cm)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Temperature (field)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Fluoride	4.0	3.2	4.0	3.2	4.0	3.2	4.0	3.2	4.0	3.2	Reserved ⁴	Reserved
Magnesium	NE	23	NE	6.2	NE	45	NE	46.0	NE	11	Reserved	Reserved
Sulfate	NE	144	NE	181	NE	351	NE	329	NE	200	Reserved	Reserved
Total dissolved solids	NE	874	NE	801	NE	1666	NE	1731	NE	855	Reserved	Reserved

Notes:

- ¹ Metals must be analyzed as dissolved metals.
- ² Monitor = Monitoring required, but no aquifer quality limit (AQL) or alert level (AL) will be established in the permit.
- ³ NE = Not Established
- ⁴ Reserved - AQL/Als pending ambient monitoring being performed per Section 2.5.3.2 and the CSI requirements.
- mhos/cm = millimhos per centimeter
- amsl = above mean sea level
- bgs = below ground surface
- mg/L = milligrams per liter
- S.U. = standard unit

Table 13.1. Quarterly Groundwater Compliance Monitoring at Supplemental Monitoring Wells

Parameter	M66-UBF (USDW Monitoring Well)		M67-LBF (USDW Monitoring Well)		M68-LBF (USDW Monitoring Well)		M69-UBF (USDW Monitoring Well)	
	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)
Depth to Groundwater (ft. bgs)	TBD ¹	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Water Level Elevation (ft amsl)	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Indicator Parameters:								
pH (field) (S.U.)	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Specific Conductance (field) (mhos/cm)	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Temperature (field)	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Fluoride	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Magnesium	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Sulfate	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Total dissolved solids	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Parameter	M70-LBF (USDW Monitoring Well)		M71-UBF (USDW Monitoring Well)		M72-UBF (ACD Demonstration Well)		M73-LBF (ACD Demonstration Well)	
	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)
Depth to Groundwater (ft. bgs)	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Water Level Elevation (ft amsl)	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Indicator Parameters:								
pH (field) (S.U.)	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Specific Conductance (field) (mhos/cm)	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Temperature (field)	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Fluoride	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Magnesium	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Sulfate	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Total dissolved solids	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Parameter	M62-LBF (Fault Monitoring Well)		M63-LBF (Fault Monitoring Well)		M64-LBF (Fault Monitoring Well)		M65-LBF (Fault Monitoring Well)	
	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)
Depth to Groundwater (ft. bgs)	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Water Level Elevation (ft amsl)	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Indicator Parameters:								
pH (field) (S.U.)	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Specific Conductance (field) (mhos/cm)	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Temperature (field)	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Fluoride	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Magnesium	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Sulfate	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Total dissolved solids	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Parameter	M75-UBF (Fault Monitoring Well)		M74-O (Fault Monitoring Well)		M77-UBF (Fault Monitoring Well)		M76-O (Fault Monitoring Well)	
	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)
Depth to Groundwater (ft. bgs)	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Water Level Elevation (ft amsl)	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Indicator Parameters:								
pH (field) (S.U.)	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Specific Conductance (field) (mhos/cm)	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Temperature (field)	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Fluoride	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Magnesium	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Sulfate	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Total dissolved solids	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD

Notes:

ACD = annular conductivity device

AL = alert level

AQL = Aquifer Quality Limits

ft. amsl = feet above mean sea level

ft. bgs = feet below ground surface

mg/L = milligrams per liter

mhos/cm = microsiemens per centimeter

S.U. = standard unit

TBD = To Be Determined

USDW = Underground Source of Drinking Water

TABLE 14
ANNUAL GROUNDWATER MONITORING
FLORENCE COPPER INC.
FLORENCE, ARIZONA

Parameter ¹	M1-GL		M2-GU		M3-GL		M4-O		M6-GU		M7-GL		M8-O		M14-GL		M15-GU	
	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)
pH (lab)	Monitor ²	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Bicarbonate	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Calcium	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Carbonate	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Chloride	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Nitrate as nitrogen ³	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Potassium	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Sodium	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Cation/anion balance	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Aluminum	Monitor	0.71	Monitor	0.71	Monitor	0.71	Monitor	0.71	Monitor	0.71	Monitor	0.71	NE	0.71	NE	0.71	NE	0.71
Antimony	0.006	0.005	0.016	Monitor	0.006	0.005	0.006	0.005	0.006	0.005	0.006	0.005	0.006	0.005	0.016	NE	0.016	NE
Arsenic	0.05	0.026	0.05	0.026	0.05	0.026	0.05	0.026	0.05	0.026	0.05	0.026	0.05	0.026	0.05	0.026	0.05	0.026
Barium	2.0	1.6	2.0	1.6	2.0	1.6	2.0	1.6	2.0	1.6	2.0	1.6	2.0	1.6	2.0	1.6	2.0	1.6
Beryllium	0.004	0.0032	0.0053	Monitor	0.0053	Monitor	0.0053	NE	0.004	0.0032	0.004	0.0032	0.004	0.0032	0.004	0.0032	0.004	0.0032
Cadmium	0.005	Monitor	0.040	Monitor	0.005	Monitor	0.040	NE	0.005	0.004	0.040	NE	0.005	0.004	0.005	0.004	0.04	NE
Chromium (total)	0.10	0.08	0.10	0.08	0.10	0.08	0.10	0.08	0.10	0.08	0.10	0.08	0.10	0.08	0.10	0.08	0.10	0.08
Cobalt	NE ⁴	0.005	NE	0.005	NE	0.005	NE	0.005	NE	0.005	NE	0.005	NE	0.005	NE	0.005	NE	0.005
Copper	NE	0.51	NE	0.51	NE	0.51	NE	0.51	NE	0.51	NE	0.51	NE	0.8	NE	0.8	NE	0.8
Iron	NE	2.2	NE	2.2	NE	2.2	NE	2.2	NE	2.2	NE	2.2	NE	2.2	NE	2.2	NE	2.2
Lead	0.05	0.04	0.05	0.04	0.05	0.04	0.05	0.026	0.05	0.026	0.05	0.026	0.05	0.04	0.05	0.04	0.05	0.04
Manganese	NE	0.22	NE	0.22	NE	0.22	NE	0.22	NE	0.22	NE	0.22	NE	0.22	NE	0.22	NE	0.22
Mercury	0.002	0.0016	0.002	0.0016	0.002	0.0016	0.002	0.0011	0.002	0.0011	0.002	0.0011	0.002	0.0016	0.002	0.0016	0.002	0.0016
Nickel	0.13	NE	0.13	NE	0.13	NE	0.10	0.08	0.10	0.08	0.13	NE	0.1	0.08	0.13	NE	0.13	NE
Selenium	0.05	0.04	0.05	0.04	0.05	0.04	0.05	0.027	0.05	0.027	0.05	0.027	0.05	0.04	0.05	0.04	0.05	0.04
Thallium	0.002	0.0016	0.002	0.0016	0.002	0.0016	0.002	0.0016	0.002	0.0016	0.002	0.0016	0.002	0.0016	0.002	0.0016	0.002	0.0016
Zinc	NE	2.5	NE	2.5	NE	2.5	NE	2.5	NE	2.5	NE	2.5	NE	4	NE	4	NE	4
Gross Alpha	NE	15	NE	15	NE	1	NE	15	NE	15	NE	15	NE	15	NE	15	NE	1
Adjusted Gross Alpha (pCi/L) ⁵	15	12	15	12	15	12	15	12	15	12	15	12	15	12	15	12	15	12
Radium 226 + 228 (pCi/L)	5	4	5	4	5	4	5	Monitor	5	4	5	4	5	4	5	4	5	4
Total Uranium Isotopes (pCi/L) ⁶	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Total Uranium	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Total petroleum hydrocarbons- diesel	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Benzene	0.005	0.004	0.005	0.004	0.005	0.004	0.005	0.004	0.005	0.004	0.005	0.004	0.005	0.004	0.005	0.004	0.005	0.004
Ethylbenzene	0.7	0.56	0.7	0.56	0.7	0.56	0.7	0.56	0.7	0.56	0.7	0.56	0.7	0.56	0.7	0.56	0.7	0.56
Toluene	1.0	0.8	1.0	0.8	1.0	0.8	1.0	0.8	1.0	0.8	1.0	0.8	1.0	0.8	1.0	0.8	1.0	0.8
Total Xylene	10	8	10	8	10	8	10	8	10	8	10	8	10	8	10	8	10	8

Notes:

¹ Metals must be analyzed as dissolved metals.

² Monitor = Monitoring required, but no AQL or AL will be established in the permit.

³ Nitrate will be used only for calculation of cation/anion balance because of regional nitrate pollution and none used in processes.

⁴ NE = Not Established

⁵ If the gross alpha particle activity is greater than the AL or AQL, then calculate the adjusted gross alpha particle activity. The adjusted gross alpha particle activity is the gross alpha particle activity, including radium 226, and any other alpha emitters, if present in the water sample, minus radon and total uranium (the sum of uranium 238, uranium 235 and uranium 234 isotopes). The gross alpha analytical procedure (evaporation technique: EPA Method 900.0) drives off radon gas in the water samples. Therefore, the Adjusted Gross Alpha should be calculated using the following formula: (Laboratory Reported Gross Alpha MINUS Sum of the Uranium Isotopes).

⁶ Uranium Isotope activity results must be used for calculating Adjusted Gross Alpha.

TABLE 14
ANNUAL GROUNDWATER MONITORING
FLORENCE COPPER INC.
FLORENCE, ARIZONA

Parameter ¹	M16-GU(R)		M17-GL		M18-GU		M19-LBF		M20-O(R)		M21-UBF		M22-O		M23-UBF		M24-O	
	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)
pH (lab)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Bicarbonate	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Calcium	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Carbonate	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Chloride	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Nitrate as nitrogen ³	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Potassium	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Sodium	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Cation/anion balance	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Aluminum	NE	0.71	NE	0.71	NE	0.71	NE	0.71	NE	0.71	NE	0.71	NE	0.71	NE	0.71	NE	0.71
Antimony	0.006	0.005	0.016	NE	0.016	NE	0.006	0.005	0.006	0.005	0.016	NE	0.016	NE	0.006	0.005	0.006	0.005
Arsenic	0.05	0.026	0.05	0.026	0.05	0.026	0.05	0.026	0.05	0.026	0.05	0.026	0.05	0.026	0.05	0.026	0.05	0.026
Barium	2.0	1.6	2.0	1.6	2.0	1.6	2.0	1.6	2.0	1.6	2.0	1.6	2.0	1.6	2.0	1.6	2.0	1.6
Beryllium	0.004	0.0032	0.004	0.0032	0.004	0.0032	0.004	0.0032	0.004	0.0032	0.004	0.0032	0.004	0.0032	0.004	0.0032	0.004	0.0032
Cadmium	0.04	NE	0.005	0.004	0.04	NE	0.005	0.004	0.04	NE	0.04	NE	0.04	NE	0.04	NE	0.005	0.004
Chromium (total)	0.10	0.08	0.10	0.08	0.10	0.08	0.10	0.08	0.10	0.08	0.10	0.08	0.10	0.08	0.10	0.08	0.10	0.08
Cobalt	NE	0.005	NE	0.005	NE	0.005	NE	0.005	NE	0.005	NE	0.005	NE	0.005	NE	0.005	NE	0.005
Copper	NE	0.8	NE	0.8	NE	0.8	NE	0.8	NE	0.8	NE	0.8	NE	0.8	NE	0.8	NE	0.8
Iron	NE	2.2	NE	2.2	NE	2.2	NE	2.2	NE	2.2	NE	2.2	NE	2.2	NE	2.2	NE	2.2
Lead	0.05	0.04	0.05	0.04	0.05	0.04	0.05	0.04	0.05	0.04	0.05	0.04	0.05	0.04	0.05	0.04	0.05	0.04
Manganese	NE	0.22	NE	0.22	NE	0.22	NE	0.22	NE	0.22	NE	0.22	NE	0.22	NE	0.22	NE	0.22
Mercury	0.002	0.0016	0.002	0.0016	0.002	0.0016	0.002	0.0016	0.002	0.0016	0.002	0.0016	0.002	0.0016	0.002	0.0016	0.002	0.0016
Nickel	0.1	0.08	0.1	0.08	0.1	0.08	0.1	0.08	0.1	0.08	0.1	0.08	0.1	0.08	0.1	0.08	0.1	0.08
Selenium	0.05	0.04	0.05	0.04	0.05	0.04	0.05	0.04	0.05	0.04	0.05	0.04	0.05	0.04	0.05	0.04	0.05	0.04
Thallium	0.002	0.0016	0.024	NE	0.002	0.0016	0.024	NE	0.024	NE	0.024	NE	0.024	NE	0.024	NE	0.002	0.0016
Zinc	NE	4	NE	4	NE	4	NE	4	NE	4	NE	4	NE	4	NE	4	NE	4
Gross Alpha	NE	15	NE	15	NE	15	NE	15	NE	15	NE	15	NE	15	NE	15	NE	15
Adjusted Gross Alpha (pCi/L) ⁵	15	12	15	12	15	12	15	12	15	12	15	12	15	12	15	12	15	12
Radium 226 + 228 (pCi/L)	5	4	5	4	5	4	5	4	5	4	5	4	5	4	5	4	5	4
Total Uranium Isotopes (pCi/L) ⁶	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Total Uranium	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Total petroleum hydrocarbons- diesel	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Benzene	0.005	0.004	0.005	0.004	0.005	0.004	0.005	0.004	0.005	0.004	0.005	0.004	0.005	0.004	0.005	0.004	0.005	0.004
Ethylbenzene	0.7	0.56	0.7	0.56	0.7	0.56	0.7	0.56	0.7	0.56	0.7	0.56	0.7	0.56	0.7	0.56	0.7	0.56
Toluene	1.0	0.8	1.0	0.8	1.0	0.8	1.0	0.8	1.0	0.8	1.0	0.8	1.0	0.8	1.0	0.8	1.0	0.8
Total Xylene	10	8	10	8	10	8	10	8	10	8	10	8	10	8	10	8	10	8

Notes:

¹ Metals must be analyzed as dissolved metals.

² Monitor = Monitoring required, but no AQL or AL will be established in the permit.

³ Nitrate will be used only for calculation of cation/anion balance because of regional nitrate pollution and none used in processes.

⁴ NE = Not Established

⁵ If the gross alpha particle activity is greater than the AL or AQL, then calculate the adjusted gross alpha particle activity. The adjusted gross alpha particle activity is the gross alpha particle activity, including radium 226, and any other alpha emitters, if present in the water sample, minus radon and total uranium (the sum of uranium 238, uranium 235 and uranium 234 isotopes). The gross alpha analytical procedure (evaporation technique: EPA Method 900.0) drives off radon gas in the water samples. Therefore, the Adjusted Gross Alpha should be calculated using the following formula: (Laboratory Reported Gross Alpha MINUS Sum of the Uranium Isotopes).

⁶ Uranium Isotope activity results must be used for calculating Adjusted Gross Alpha.

TABLE 14
ANNUAL GROUNDWATER MONITORING
FLORENCE COPPER INC.
FLORENCE, ARIZONA

Parameter ¹	M25-UBF		M26-O		M27-LBF		M28-LBF		M29-UBF		M30-O		M31-LBF		O19-GL		O49-GL(R)	
	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)
pH (lab)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Bicarbonate	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Calcium	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Carbonate	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Chloride	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Nitrate as nitrogen ³	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Potassium	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Sodium	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Cation/anion balance	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Aluminum	NE	0.71	NE	0.71	NE	0.71	NE	0.71	NE	0.71	NE	0.71	NE	0.71	NE	0.71	NE	0.71
Antimony	0.006	0.005	0.016	NE	0.006	0.005	0.006	0.005	0.006	0.005	0.006	0.005	0.006	0.005	0.006	0.005	0.006	0.005
Arsenic	0.05	0.026	0.05	0.026	0.05	0.026	0.05	0.026	0.05	0.026	0.05	0.026	0.05	0.026	0.05	0.026	0.05	0.026
Barium	2.0	1.6	2.0	1.6	2.0	1.6	2.0	1.6	2.0	1.6	2.0	1.6	2.0	1.6	2.0	1.6	2.0	1.6
Beryllium	0.004	0.0032	0.004	0.0032	0.004	0.0032	0.004	0.0032	0.004	0.0032	0.004	0.0032	0.004	0.0032	0.004	0.0032	0.004	0.0032
Cadmium	0.005	0.004	0.005	0.004	0.005	0.004	0.005	0.004	0.005	0.004	0.005	0.004	0.005	0.004	0.005	0.004	0.005	0.004
Chromium (total)	0.10	0.08	0.10	0.08	0.10	0.08	0.10	0.08	0.10	0.08	0.10	0.08	0.10	0.08	0.10	0.08	0.10	0.08
Cobalt	NE	0.005	NE	0.005	NE	0.005	NE	0.005	NE	0.005	NE	0.005	NE	0.005	NE	0.005	NE	0.005
Copper	NE	0.8	NE	0.8	NE	0.8	NE	0.8	NE	0.8	NE	0.8	NE	0.8	NE	0.8	NE	0.8
Iron	NE	2.2	NE	2.2	NE	2.2	NE	2.2	NE	2.2	NE	2.2	NE	2.2	NE	2.2	NE	2.2
Lead	0.05	0.04	0.05	0.04	0.05	0.04	0.05	0.04	0.05	0.04	0.05	0.04	0.05	0.04	0.05	0.04	0.05	0.04
Manganese	NE	0.22	NE	0.22	NE	0.22	NE	0.22	NE	0.22	NE	0.22	NE	0.22	NE	0.22	NE	0.22
Mercury	0.002	0.0016	0.002	0.0016	0.002	0.0016	0.002	0.0016	0.002	0.0016	0.002	0.0016	0.002	0.0016	0.002	0.0016	0.002	0.0016
Nickel	0.1	0.08	0.1	0.08	0.1	0.08	0.1	0.08	0.1	0.08	0.1	0.08	0.1	0.08	0.13	NE	0.1	0.08
Selenium	0.05	0.04	0.05	0.04	0.05	0.04	0.05	0.04	0.05	0.04	0.05	0.04	0.05	0.04	0.05	0.04	0.05	0.04
Thallium	0.024	NE	0.002	0.0016	0.024	NE	0.024	NE	0.024	NE	0.024	NE	0.024	NE	0.024	NE	0.024	NE
Zinc	NE	4	NE	4	NE	4	NE	4	NE	4	NE	4	NE	4	NE	4	NE	4
Gross Alpha	NE	15	NE	15	NE	15	NE	15	NE	15	NE	15	NE	15	NE	15	NE	15
Adjusted Gross Alpha (pCi/L) ⁵	15	12	15	12	15	12	15	12	15	12	15	12	15	12	15	12	15	12
Radium 226 + 228 (pCi/L)	5	4	5	4	5	4	5	4	5	4	5	4	5	4	5	4	5	4
Total Uranium Isotopes (pCi/L) ⁶	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Total Uranium	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Total petroleum hydrocarbons- diesel	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Benzene	0.005	0.004	0.005	0.004	0.005	0.004	0.005	0.004	0.005	0.004	0.005	0.004	0.005	0.004	0.005	0.004	0.005	0.004
Ethylbenzene	0.7	0.56	0.7	0.56	0.7	0.56	0.7	0.56	0.7	0.56	0.7	0.56	0.7	0.56	0.7	0.56	0.7	0.56
Toluene	1.0	0.8	1.0	0.8	1.0	0.8	1.0	0.8	1.0	0.8	1.0	0.8	1.0	0.8	1.0	0.8	1.0	0.8
Total Xylene	10	8	10	8	10	8	10	8	10	8	10	8	10	8	10	8	10	8

Notes:

¹ Metals must be analyzed as dissolved metals.

² Monitor = Monitoring required, but no AQL or AL will be established in the permit.

³ Nitrate will be used only for calculation of cation/anion balance because of regional nitrate pollution and none used in processes.

⁴ NE = Not Established

⁵ If the gross alpha particle activity is greater than the AL or AQL, then calculate the adjusted gross alpha particle activity. The adjusted gross alpha particle activity is the gross alpha particle activity, including radium 226, and any other alpha emitters, if present in the water sample, minus radon and total uranium (the sum of uranium 238, uranium 235 and uranium 234 isotopes). The gross alpha analytical procedure (evaporation technique: EPA Method 900.0) drives off radon gas in the water samples. Therefore, the Adjusted Gross Alpha should be calculated using the following formula: (Laboratory Reported Gross Alpha MINUS Sum of the Uranium Isotopes).

⁶ Uranium Isotope activity results must be used for calculating Adjusted Gross Alpha.

TABLE 14
ANNUAL GROUNDWATER MONITORING
FLORENCE COPPER INC.
FLORENCE, ARIZONA

Parameter ¹	P19-1-O		P49-O		M52-UBF		M54-LBF		M54-O		M33-UBF (replacement)	
	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)
pH (lab)	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Bicarbonate	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Calcium	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Carbonate	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Chloride	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Nitrate as nitrogen ³	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Potassium	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Sodium	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Cation/anion balance	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Aluminum	NE	0.71	NE	0.71	NE	0.16	NE	0.16	NE	0.16	Reserved	Reserved
Antimony	0.006	0.005	0.006	0.005	0.006	0.0048	0.006	0.0048	0.006	0.0048	Reserved	Reserved
Arsenic	0.05	0.026	0.05	0.026	0.05	0.026	0.05	0.026	0.05	0.026	Reserved	Reserved
Barium	2.0	1.6	2.0	1.6	2.0	1.6	2.0	1.6	2.0	1.6	Reserved	Reserved
Beryllium	0.0053	NE	0.0053	NE	0.004	0.0032	0.004	0.0032	0.004	0.0032	Reserved	Reserved
Cadmium	0.005	0.004	0.005	0.004	0.005	0.004	0.005	0.004	0.005	0.004	Reserved	Reserved
Chromium (total)	0.10	0.08	0.10	0.08	0.10	0.08	0.10	0.08	0.10	0.08	Reserved	Reserved
Cobalt	NE	0.005	NE	0.005	NE	0.002	NE	0.002	NE	0.002	Reserved	Reserved
Copper	NE	0.8	NE	0.8	NE	0.8	NE	0.8	NE	0.8	Reserved	Reserved
Iron	NE	2.2	NE	2.2	NE	1.4	NE	1.4	NE	1.4	Reserved	Reserved
Lead	0.05	0.04	0.05	0.04	0.05	0.04	0.05	0.04	0.05	0.04	Reserved	Reserved
Manganese	NE	0.22	NE	0.22	NE	0.52	NE	0.52	NE	0.22	Reserved	Reserved
Mercury	0.002	0.0016	0.002	0.0016	0.002	0.0016	0.002	0.0016	0.002	0.0016	Reserved	Reserved
Nickel	0.13	NE	0.1	0.08	0.1	0.08	0.1	0.08	0.1	0.08	Reserved	Reserved
Selenium	0.05	0.04	0.05	0.04	0.05	0.04	0.05	0.04	0.05	0.04	Reserved	Reserved
Thallium	0.024	NE	0.002	0.0016	0.002	0.0016	0.002	0.0016	0.002	0.0016	Reserved	Reserved
Zinc	NE	4	NE	4	NE	4	NE	4	NE	4	Reserved	Reserved
Gross Alpha	NE	15	NE	15	NE	15	NE	15	NE	15	Reserved	Reserved
Adjusted Gross Alpha (pCi/L) ⁵	15	12	15	12	15	12	26.5	NE	26.5	NE	Reserved	Reserved
Radium 226 + 228 (pCi/L)	5	4	5	4	17.2	NE	17.2	NE	17.2	NE	Reserved	Reserved
Total Uranium Isotopes (pCi/L) ⁶	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Total Uranium	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Total petroleum hydrocarbons- diesel	Monitor	Monitor	Monitor	Monitor	Monitor	NE	Monitor	Monitor	Monitor	Monitor	Monitor	Monitor
Benzene	0.005	0.004	0.005	0.004	0.005	0.004	0.005	0.004	0.005	0.004	0.005	0.004
Ethylbenzene	0.7	0.56	0.7	0.56	0.7	0.56	0.7	0.56	0.7	0.56	0.7	0.56
Toluene	1.0	0.8	1.0	0.8	1.0	0.8	1.0	0.8	1.0	0.8	1.0	0.8
Total Xylene	10	8	10	8	10	8	10	8	10	8	10	8

Notes:

¹ Metals must be analyzed as dissolved metals.

² Monitor = Monitoring required, but no AQL or AL will be established in the permit.

³ Nitrate will be used only for calculation of cation/anion balance because of regional nitrate pollution and none used in processes.

⁴ NE = Not Established

⁵ If the gross alpha particle activity is greater than the AL or AQL, then calculate the adjusted gross alpha particle activity. The adjusted gross alpha particle activity is the gross alpha particle activity, including radium 226, and any other alpha emitters, if present in the water sample, minus radon and total uranium (the sum of uranium 238, uranium 235 and uranium 234 isotopes). The gross alpha analytical procedure (evaporation technique: EPA Method 900.0) drives off radon gas in the water samples. Therefore, the Adjusted Gross Alpha should be calculated using the following formula: (Laboratory Reported Gross Alpha MINUS Sum of the Uranium Isotopes).

⁶ Uranium Isotope activity results must be used for calculating Adjusted Gross Alpha.

Table 14.1. Annual Groundwater Compliance Monitoring at Supplemental Monitoring Wells

Parameter ¹	M66-UBF (USDW Monitoring Well)		M67-LBF (USDW Monitoring Well)		M68-LBF (USDW Monitoring Well)	
	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)
pH (lab)	TBD	TBD	TBD	TBD	TBD	TBD
Bicarbonate	TBD	TBD	TBD	TBD	TBD	TBD
Calcium	TBD	TBD	TBD	TBD	TBD	TBD
Carbonate	TBD	TBD	TBD	TBD	TBD	TBD
Chloride	TBD	TBD	TBD	TBD	TBD	TBD
Nitrate as nitrogen ³	TBD	TBD	TBD	TBD	TBD	TBD
Potassium	TBD	TBD	TBD	TBD	TBD	TBD
Sodium	TBD	TBD	TBD	TBD	TBD	TBD
Cation/anion balance	TBD	TBD	TBD	TBD	TBD	TBD
Aluminum	TBD	TBD	TBD	TBD	TBD	TBD
Antimony	TBD	TBD	TBD	TBD	TBD	TBD
Arsenic	TBD	TBD	TBD	TBD	TBD	TBD
Barium	TBD	TBD	TBD	TBD	TBD	TBD
Beryllium	TBD	TBD	TBD	TBD	TBD	TBD
Cadmium	TBD	TBD	TBD	TBD	TBD	TBD
Chromium (total)	TBD	TBD	TBD	TBD	TBD	TBD
Cobalt	TBD	TBD	TBD	TBD	TBD	TBD
Copper	TBD	TBD	TBD	TBD	TBD	TBD
Iron	TBD	TBD	TBD	TBD	TBD	TBD
Lead	TBD	TBD	TBD	TBD	TBD	TBD
Manganese	TBD	TBD	TBD	TBD	TBD	TBD
Mercury	TBD	TBD	TBD	TBD	TBD	TBD
Nickel	TBD	TBD	TBD	TBD	TBD	TBD
Selenium	TBD	TBD	TBD	TBD	TBD	TBD
Thallium	TBD	TBD	TBD	TBD	TBD	TBD
Zinc	TBD	TBD	TBD	TBD	TBD	TBD
Gross Alpha	TBD	TBD	TBD	TBD	TBD	TBD
Adjusted Gross Alpha (pCi/L) ⁵	TBD	TBD	TBD	TBD	TBD	TBD
Radium 226 + 228 (pCi/L)	TBD	TBD	TBD	TBD	TBD	TBD
Total Uranium Isotopes (pCi/L) ⁶	TBD	TBD	TBD	TBD	TBD	TBD
Total Uranium	TBD	TBD	TBD	TBD	TBD	TBD
Total petroleum hydrocarbons- diesel	TBD	TBD	TBD	TBD	TBD	TBD
Benzene	TBD	TBD	TBD	TBD	TBD	TBD
Ethylbenzene	TBD	TBD	TBD	TBD	TBD	TBD
Toluene	TBD	TBD	TBD	TBD	TBD	TBD
Total Xylene	TBD	TBD	TBD	TBD	TBD	TBD

Notes:

¹ Metals must be analyzed as dissolved metals.

² Monitor = Monitoring required, but no AQL or AL will be established in the permit.

³ Nitrate will be used only for calculation of cation/anion balance because of regional nitrate pollution and none used in processes.

⁴ NE = Not Established

⁵ If the gross alpha particle activity is greater than the AL or AQL, then calculate the adjusted gross alpha particle activity. The adjusted gross alpha particle activity is the gross alpha particle activity, including radium 226, and any other alpha emitters, if present in the water sample, minus radon and total uranium (the sum of uranium 238, uranium 235 and uranium 234 isotopes). The gross alpha analytical procedure (evaporation technique: EPA Method 900.0) drives off radon gas in the water samples. Therefore, the Adjusted Gross Alpha should be calculated using the following formula: (Laboratory Reported Gross Alpha MINUS Sum of the Uranium Isotopes).

⁶ Uranium Isotope activity results must be used for calculating Adjusted Gross Alpha.

AL = alert level

AQL = Aquifer Quality Limit

mg/L = milligrams per liter

pCi/L = picocuries per liter

TBD = To Be Determined

USDW = Underground Source of Drinking Water

Table 14.1. Annual Groundwater Compliance Monitoring at Supplemental Monitoring Wells

Parameter	M69-UBF (USDW Monitoring Well)		M70-LBF (USDW Monitoring Well)		M71-UBF (USDW Monitoring Well)	
	AQL (mg/l)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)
pH (lab)	TBD	TBD	TBD	TBD	TBD	TBD
Bicarbonate	TBD	TBD	TBD	TBD	TBD	TBD
Calcium	TBD	TBD	TBD	TBD	TBD	TBD
Carbonate	TBD	TBD	TBD	TBD	TBD	TBD
Chloride	TBD	TBD	TBD	TBD	TBD	TBD
Nitrate as nitrogen	TBD	TBD	TBD	TBD	TBD	TBD
Potassium	TBD	TBD	TBD	TBD	TBD	TBD
Sodium	TBD	TBD	TBD	TBD	TBD	TBD
Cation/anion balance	TBD	TBD	TBD	TBD	TBD	TBD
Aluminum	TBD	TBD	TBD	TBD	TBD	TBD
Antimony	TBD	TBD	TBD	TBD	TBD	TBD
Arsenic	TBD	TBD	TBD	TBD	TBD	TBD
Barium	TBD	TBD	TBD	TBD	TBD	TBD
Beryllium	TBD	TBD	TBD	TBD	TBD	TBD
Cadmium	TBD	TBD	TBD	TBD	TBD	TBD
Chromium (total)	TBD	TBD	TBD	TBD	TBD	TBD
Cobalt	TBD	TBD	TBD	TBD	TBD	TBD
Copper	TBD	TBD	TBD	TBD	TBD	TBD
Iron	TBD	TBD	TBD	TBD	TBD	TBD
Lead	TBD	TBD	TBD	TBD	TBD	TBD
Manganese	TBD	TBD	TBD	TBD	TBD	TBD
Mercury	TBD	TBD	TBD	TBD	TBD	TBD
Nickel	TBD	TBD	TBD	TBD	TBD	TBD
Selenium	TBD	TBD	TBD	TBD	TBD	TBD
Thallium	TBD	TBD	TBD	TBD	TBD	TBD
Zinc	TBD	TBD	TBD	TBD	TBD	TBD
Gross Alpha	TBD	TBD	TBD	TBD	TBD	TBD
Adjusted Gross Alpha (pCi/L)	TBD	TBD	TBD	TBD	TBD	TBD
Radium 226 + 228 (pCi/L)	TBD	TBD	TBD	TBD	TBD	TBD
Total Uranium Isotopes (pCi/L)	TBD	TBD	TBD	TBD	TBD	TBD
Total Uranium	TBD	TBD	TBD	TBD	TBD	TBD
Total petroleum hydrocarbons- diesel	TBD	TBD	TBD	TBD	TBD	TBD
Benzene	TBD	TBD	TBD	TBD	TBD	TBD
Ethylbenzene	TBD	TBD	TBD	TBD	TBD	TBD
Toluene	TBD	TBD	TBD	TBD	TBD	TBD
Total Xylene	TBD	TBD	TBD	TBD	TBD	TBD

Notes:

AL = alert level

AQL = Aquifer Quality Limit

mg/L = milligrams per liter

pCi/L = picocuries per liter

TBD = To Be Determined

USDW = Underground Source of Drinking Water

Table 14.1. Annual Groundwater Compliance Monitoring at Supplemental Monitoring Wells

Parameter	M72-UBF (ACD Demonstration Well)		M73-LBF (ACD Demonstration Well)		M62-LBF (Fault Monitoring Well)	
	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)
pH (lab)	TBD	TBD	TBD	TBD	TBD	TBD
Bicarbonate	TBD	TBD	TBD	TBD	TBD	TBD
Calcium	TBD	TBD	TBD	TBD	TBD	TBD
Carbonate	TBD	TBD	TBD	TBD	TBD	TBD
Chloride	TBD	TBD	TBD	TBD	TBD	TBD
Nitrate as nitrogen	TBD	TBD	TBD	TBD	TBD	TBD
Potassium	TBD	TBD	TBD	TBD	TBD	TBD
Sodium	TBD	TBD	TBD	TBD	TBD	TBD
Cation/anion balance	TBD	TBD	TBD	TBD	TBD	TBD
Aluminum	TBD	TBD	TBD	TBD	TBD	TBD
Antimony	TBD	TBD	TBD	TBD	TBD	TBD
Arsenic	TBD	TBD	TBD	TBD	TBD	TBD
Barium	TBD	TBD	TBD	TBD	TBD	TBD
Beryllium	TBD	TBD	TBD	TBD	TBD	TBD
Cadmium	TBD	TBD	TBD	TBD	TBD	TBD
Chromium (total)	TBD	TBD	TBD	TBD	TBD	TBD
Cobalt	TBD	TBD	TBD	TBD	TBD	TBD
Copper	TBD	TBD	TBD	TBD	TBD	TBD
Iron	TBD	TBD	TBD	TBD	TBD	TBD
Lead	TBD	TBD	TBD	TBD	TBD	TBD
Manganese	TBD	TBD	TBD	TBD	TBD	TBD
Mercury	TBD	TBD	TBD	TBD	TBD	TBD
Nickel	TBD	TBD	TBD	TBD	TBD	TBD
Selenium	TBD	TBD	TBD	TBD	TBD	TBD
Thallium	TBD	TBD	TBD	TBD	TBD	TBD
Zinc	TBD	TBD	TBD	TBD	TBD	TBD
Gross Alpha	TBD	TBD	TBD	TBD	TBD	TBD
Adjusted Gross Alpha (pCi/L)	TBD	TBD	TBD	TBD	TBD	TBD
Radium 226 + 228 (pCi/L)	TBD	TBD	TBD	TBD	TBD	TBD
Total Uranium Isotopes (pCi/L)	TBD	TBD	TBD	TBD	TBD	TBD
Total Uranium	TBD	TBD	TBD	TBD	TBD	TBD
Total petroleum hydrocarbons- diesel	TBD	TBD	TBD	TBD	TBD	TBD
Benzene	TBD	TBD	TBD	TBD	TBD	TBD
Ethylbenzene	TBD	TBD	TBD	TBD	TBD	TBD
Toluene	TBD	TBD	TBD	TBD	TBD	TBD
Total Xylene	TBD	TBD	TBD	TBD	TBD	TBD

Notes:

ACD = annular conductivity device

AL = alert level

AQL = Aquifer Quality Limit

mg/L = milligrams per liter

pCi/L = picocuries per liter

TBD = To Be Determined

Table 14.1. Annual Groundwater Compliance Monitoring at Supplemental Monitoring Wells

Parameter	M63-LBF (Fault Monitoring Well)		M64-LBF (Fault Monitoring Well)		M65-LBF (Fault Monitoring Well)	
	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)
pH (lab)	TBD	TBD	TBD	TBD	TBD	TBD
Bicarbonate	TBD	TBD	TBD	TBD	TBD	TBD
Calcium	TBD	TBD	TBD	TBD	TBD	TBD
Carbonate	TBD	TBD	TBD	TBD	TBD	TBD
Chloride	TBD	TBD	TBD	TBD	TBD	TBD
Nitrate as nitrogen	TBD	TBD	TBD	TBD	TBD	TBD
Potassium	TBD	TBD	TBD	TBD	TBD	TBD
Sodium	TBD	TBD	TBD	TBD	TBD	TBD
Cation/anion balance	TBD	TBD	TBD	TBD	TBD	TBD
Aluminum	TBD	TBD	TBD	TBD	TBD	TBD
Antimony	TBD	TBD	TBD	TBD	TBD	TBD
Arsenic	TBD	TBD	TBD	TBD	TBD	TBD
Barium	TBD	TBD	TBD	TBD	TBD	TBD
Beryllium	TBD	TBD	TBD	TBD	TBD	TBD
Cadmium	TBD	TBD	TBD	TBD	TBD	TBD
Chromium (total)	TBD	TBD	TBD	TBD	TBD	TBD
Cobalt	TBD	TBD	TBD	TBD	TBD	TBD
Copper	TBD	TBD	TBD	TBD	TBD	TBD
Iron	TBD	TBD	TBD	TBD	TBD	TBD
Lead	TBD	TBD	TBD	TBD	TBD	TBD
Manganese	TBD	TBD	TBD	TBD	TBD	TBD
Mercury	TBD	TBD	TBD	TBD	TBD	TBD
Nickel	TBD	TBD	TBD	TBD	TBD	TBD
Selenium	TBD	TBD	TBD	TBD	TBD	TBD
Thallium	TBD	TBD	TBD	TBD	TBD	TBD
Zinc	TBD	TBD	TBD	TBD	TBD	TBD
Gross Alpha	TBD	TBD	TBD	TBD	TBD	TBD
Adjusted Gross Alpha (pCi/L)	TBD	TBD	TBD	TBD	TBD	TBD
Radium 226 + 228 (pCi/L)	TBD	TBD	TBD	TBD	TBD	TBD
Total Uranium Isotopes (pCi/L)	TBD	TBD	TBD	TBD	TBD	TBD
Total Uranium	TBD	TBD	TBD	TBD	TBD	TBD
Total petroleum hydrocarbons- diesel	TBD	TBD	TBD	TBD	TBD	TBD
Benzene	TBD	TBD	TBD	TBD	TBD	TBD
Ethylbenzene	TBD	TBD	TBD	TBD	TBD	TBD
Toluene	TBD	TBD	TBD	TBD	TBD	TBD
Total Xylene	TBD	TBD	TBD	TBD	TBD	TBD

Notes:

AL = alert level

AQL = Aquifer Quality Limit

mg/L = milligrams per liter

pCi/L = picocuries per liter

TBD = To Be Determined

Table 14.1. Annual Groundwater Compliance Monitoring at Supplemental Monitoring Wells

Parameter	M75-UBF (Fault Monitoring Well)		M74-O (Fault Monitoring Well)		M77-UBF (Fault Monitoring Well)	
	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)	AQL (mg/L)	AL (mg/L)
pH (lab)	TBD	TBD	TBD	TBD	TBD	TBD
Bicarbonate	TBD	TBD	TBD	TBD	TBD	TBD
Calcium	TBD	TBD	TBD	TBD	TBD	TBD
Carbonate	TBD	TBD	TBD	TBD	TBD	TBD
Chloride	TBD	TBD	TBD	TBD	TBD	TBD
Nitrate as nitrogen	TBD	TBD	TBD	TBD	TBD	TBD
Potassium	TBD	TBD	TBD	TBD	TBD	TBD
Sodium	TBD	TBD	TBD	TBD	TBD	TBD
Cation/anion balance	TBD	TBD	TBD	TBD	TBD	TBD
Aluminum	TBD	TBD	TBD	TBD	TBD	TBD
Antimony	TBD	TBD	TBD	TBD	TBD	TBD
Arsenic	TBD	TBD	TBD	TBD	TBD	TBD
Barium	TBD	TBD	TBD	TBD	TBD	TBD
Beryllium	TBD	TBD	TBD	TBD	TBD	TBD
Cadmium	TBD	TBD	TBD	TBD	TBD	TBD
Chromium (total)	TBD	TBD	TBD	TBD	TBD	TBD
Cobalt	TBD	TBD	TBD	TBD	TBD	TBD
Copper	TBD	TBD	TBD	TBD	TBD	TBD
Iron	TBD	TBD	TBD	TBD	TBD	TBD
Lead	TBD	TBD	TBD	TBD	TBD	TBD
Manganese	TBD	TBD	TBD	TBD	TBD	TBD
Mercury	TBD	TBD	TBD	TBD	TBD	TBD
Nickel	TBD	TBD	TBD	TBD	TBD	TBD
Selenium	TBD	TBD	TBD	TBD	TBD	TBD
Thallium	TBD	TBD	TBD	TBD	TBD	TBD
Zinc	TBD	TBD	TBD	TBD	TBD	TBD
Gross Alpha	TBD	TBD	TBD	TBD	TBD	TBD
Adjusted Gross Alpha (pCi/L)	TBD	TBD	TBD	TBD	TBD	TBD
Radium 226 + 228 (pCi/L)	TBD	TBD	TBD	TBD	TBD	TBD
Total Uranium Isotopes (pCi/L)	TBD	TBD	TBD	TBD	TBD	TBD
Total Uranium	TBD	TBD	TBD	TBD	TBD	TBD
Total petroleum hydrocarbons- diesel	TBD	TBD	TBD	TBD	TBD	TBD
Benzene	TBD	TBD	TBD	TBD	TBD	TBD
Ethylbenzene	TBD	TBD	TBD	TBD	TBD	TBD
Toluene	TBD	TBD	TBD	TBD	TBD	TBD
Total Xylene	TBD	TBD	TBD	TBD	TBD	TBD

Notes:

AL = alert level

AQL = Aquifer Quality Limit

mg/L = milligrams per liter

pCi/L = picocuries per liter

TBD = To Be Determined

Table 14.1. Annual Groundwater Compliance Monitoring at Supplemental Monitoring Wells		
Parameter	M76-O (Fault Monitoring Well)	
	AQL (mg/L)	AL (mg/L)
pH (lab)	TBD	TBD
Bicarbonate	TBD	TBD
Calcium	TBD	TBD
Carbonate	TBD	TBD
Chloride	TBD	TBD
Nitrate as nitrogen	TBD	TBD
Potassium	TBD	TBD
Sodium	TBD	TBD
Cation/anion balance	TBD	TBD
Aluminum	TBD	TBD
Antimony	TBD	TBD
Arsenic	TBD	TBD
Barium	TBD	TBD
Beryllium	TBD	TBD
Cadmium	TBD	TBD
Chromium (total)	TBD	TBD
Cobalt	TBD	TBD
Copper	TBD	TBD
Iron	TBD	TBD
Lead	TBD	TBD
Manganese	TBD	TBD
Mercury	TBD	TBD
Nickel	TBD	TBD
Selenium	TBD	TBD
Thallium	TBD	TBD
Zinc	TBD	TBD
Gross Alpha	TBD	TBD
Adjusted Gross Alpha (pCi/L)	TBD	TBD
Radium 226 + 228 (pCi/L)	TBD	TBD
Total Uranium Isotopes (pCi/L)	TBD	TBD
Total Uranium	TBD	TBD
Total petroleum hydrocarbons- diesel	TBD	TBD
Benzene	TBD	TBD
Ethylbenzene	TBD	TBD
Toluene	TBD	TBD
Total Xylene	TBD	TBD

Notes:

AL = alert level

AQL = Aquifer Quality Limit











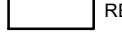




mg/L = milligrams per liter

pCi/L = picocuries per liter

TBD = To Be Determined

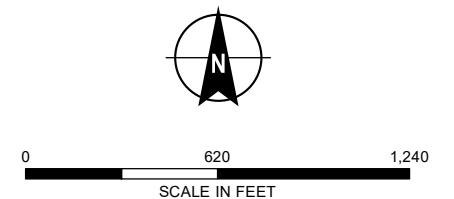
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LEGEND

- | | | | | | |
|---|------------------------------------|---|------------------------------|---|-----------------------------------|
|  | PTF CLASS III WELL |  | FAULT MONITORING WELL |  | PROPOSED AOR / FORMER BHP AOR |
|  | PROPOSED INJECTION / RECOVERY WELL |  | POINT OF COMPLIANCE WELL |  | AQUIFER EXEMPTION BOUNDARY |
|  | PROPOSED OBSERVATION WELL |  | FAULT |  | FLORENCE COPPER PROPERTY BOUNDARY |
|  | PROPOSED PERIMETER WELL |  | RESOURCE BLOCK | | |
|  | USDW MONITORING WELL |  | FUTURE WELL CLUSTER LOCATION | | |
|  | ACD DEMONSTRATION WELL |  | ISCR WELL FIELD | | |

NOTES

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE
2. TOPOGRAPHIC CONTOUR SOURCE: FLORENCE COPPER, OCTOBER 2010
3. FUTURE WELL CLUSTER LOCATIONS TO BE INSTALLED BEFORE YEAR NINE OF OPERATIONS AND INCLUDE ONE UBF, ONE LBF, AND ONE OXIDE MONITORING WELL.



HALEY
ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

PROPOSED FAULT AND USDW
MONITORING WELL LOCATIONS

FLORENCE
COPPER

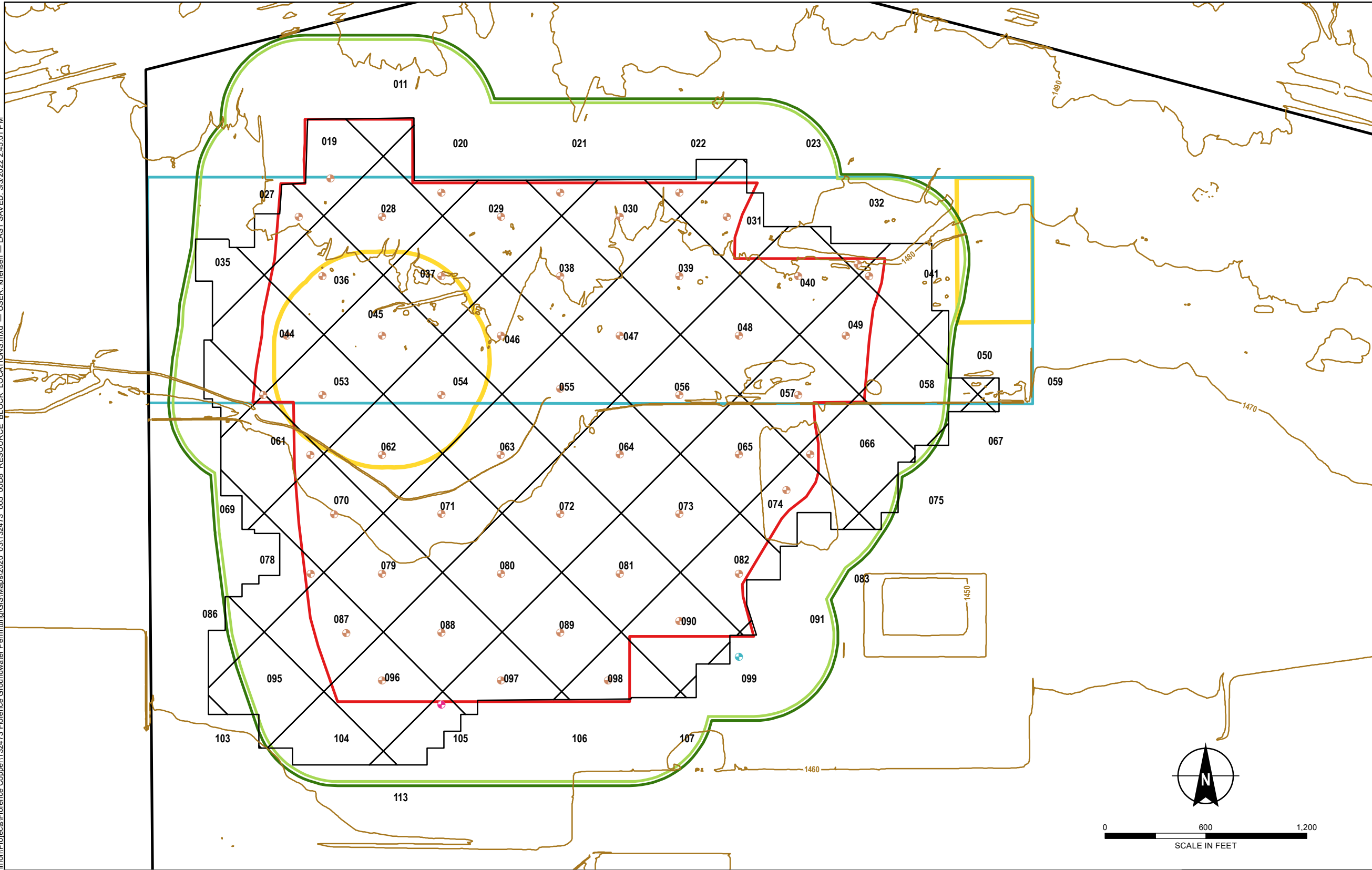
MARCH 2022

FIGURE A-17

EXHIBIT D-8

Proposed Verification Wells Figure

GIS FILE PATH: \\haleyaldrich\share\phx_common\Projects\Florence Copper\132473 Florence Groundwater Permitting\GIS\Maps\2020_03\132473_005_00D8_RESOURCE_BLOCK_LOCATIONS.mxd — USER: khensen — LAST SAVED: 3/3/2022 2:45:01 PM



Resource Block ID	Proposed Verification Wells	Easting	Northing
19	921	847389.33	747205.16
20	606	848048.26	747121.19
21	132	846987.54	745919.05
22	32	849462.37	747121.19
27	882	847199.76	746979.67
28	624	847694.69	746979.70
29	661	848401.76	746979.77
30	71	849108.81	746979.72
31	194	849745.17	746979.79
32	326	850522.94	746697.10
36	734	847341.14	746626.15
37	679	848048.20	746626.21
38	23	848755.27	746626.28
39	167	849462.32	746626.23
40	246	850169.37	746626.29
41	1890	850591.17	746626.45
44	758	847128.98	746272.60
45	557	847694.63	746272.64
46	369	848401.69	746272.70
47	98	849108.75	746272.66
48	223	849815.81	746272.72
49	321	850452.17	746272.79
53	503	847341.06	745919.07
54	461	848048.13	745919.14
55	403	848755.19	745955.32
56	958	849462.25	745919.16
57	821	850169.30	745919.21
61	2224	847269.28	745564.03
62	2119	847693.51	745564.06
63	2152	848400.57	745564.13
64	1661	849108.68	745565.60
65	1587	849815.75	745565.66
66	977	850239.98	745565.69
70	2245	847410.65	745210.51
71	2050	848048.06	745212.07
72	1728	848755.13	745212.14
73	1532	849462.18	745212.10
74	1208	850098.55	745353.56
78	1887	847270.27	744858.48
79	2076	847694.50	744858.51
80	1700	848401.56	744858.58
81	1370	849108.62	744858.53
82	1115	849815.68	744858.60
87	1932	847482.35	744504.96
88	1816	848047.82	744505.19
89	1323	848755.06	744505.07
90	1145	849462.13	744575.74
96	1878	847694.25	744222.33
97	1345	848401.50	744222.21
98	1423	849037.84	744222.16
99	1160	849815.64	744363.65
105	1847	848047.95	744080.76

LEGEND

PROPOSED INJECTION / RECOVERY WELL

PROPOSED OBSERVATION WELL

PROPOSED PERIMETER WELL

10 FOOT TOPOGRAPHIC CONTOUR

RESOURCE BLOCK

ISCR WELL FIELD

PROPOSED AOR / FORMER BHP AOR

AQUIFER EXEMPTION BOUNDARY

STATE MINERAL LEASE BOUNDARY

PTF AOR BOUNDARY

FLORENCE COPPER PROPERTY BOUNDARY

NOTES

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE

2. TOPOGRAPHY DATA BY FLORENCE COPPER, OCTOBER 2010. 10-FOOT INTERVALS SHOWN.

FLORENCE COPPER, INC.
FLORENCE, ARIZONA 85132

MARCH 2022

PROPOSED VERIFICATION WELLS

EXHIBIT D-8

Attachment E

**Plugging and Abandonment Plan (40 CFR §§ 144.31, 144.51 & 146.34)
Application for Class III Underground Injection Control Permit**

**Florence Copper Project
Florence Copper Inc.**

November 2021

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List of Exhibits

Exhibit No.	Title
E-1	Form 7520-19, Schematic Diagrams of Planned Class III ISCR Wells by Resource Block
E-2	Plugging and Abandonment Forms for Non-Class III Wells and Shafts within AOR
E-3	Plugging and Abandonment Forms for Core Holes within AOR
E-4	Plugging and Abandonment Forms for BHP Class III Test Wells

Application for Class III Underground Injection Control Permit Florence Copper Project

Attachment E: Plugging and Abandonment Plan (40 CFR §§ 144.31, 144.51 & 146.34)

E.1 INTRODUCTION

This Attachment describes the plugging and abandonment procedures and individual well and core hole details.

This Attachment has been prepared in support of an application (Application) by Florence Copper Inc. (Florence Copper) to the United States Environmental Protection Agency (USEPA) for an Underground Injection Control Class III Permit (UIC Permit) for the planned In-Situ Copper Recovery (ISCR) facility at the Florence Copper Project (FCP) in Pinal County, Arizona. With this Application, Florence Copper seeks authorization to construct and operate a commercial-scale ISCR facility at the FCP site. Florence Copper proposes to incorporate the pilot-scale Production Test Facility (PTF), which is currently operating under UIC Permit R9UIC-AZ3-FY11-1, into the planned commercial-scale ISCR facility at the FCP site.

This plugging and abandonment plan is based on Appendix C of UIC Permit R9UIC-AZ3-FY11-1, with revision and updates as necessary to reflect the proposed operations and operational experience at the PTF.

E.2 PLUGGING AND ABANDONMENT

E.2.1 Applicability

This plugging and abandonment plan is applicable to proposed Class III wells, existing Class III wells, and non-Class III wells, core holes, and shafts within the FCP ISCR area and the associated Area of Review (AOR) located at the FCP site. This plan applies to all wells, core holes, and shafts within the AOR because the corrective action for each of the wells and core holes within the AOR is to plug and abandon them using Class III well standards. The AOR is defined in Attachment A of this Application as a 500-foot circumscribing area around the planned commercial-scale ISCR well field.

This plugging and abandonment plan has been designed to ensure that all existing and future wells and core holes located within the AOR will be plugged and abandoned (1) in a manner that will prevent or stop the migration of injected solutions into Underground Sources of Drinking Water (USDW) through a penetrating core hole or well, and (2) in accordance with applicable permits and regulations administered by the USEPA, the Arizona Department of Environmental Quality (ADEQ), and Arizona Department of Water Resources (ADWR).

Plugging and abandonment of existing non-Class III wells, core holes within the AOR will occur prior to commencement of injection within 500 feet of the well or core hole. Plugging and abandonment of Class III wells will occur during closure, or when an individual Class III well is retired or closed. Retirement of a Class III well may occur if the well fails to pass mechanical integrity testing or if the well becomes damaged beyond repair.

Florence Copper plans to convert Conoco Shaft No. 1 for the recovery of ISCR solutions. The Conoco Airshaft (Shaft No. 2) will be abandoned prior to commencement of ISCR operations within 500 feet of the shaft. Conoco Shaft No. 1 will be plugged and abandoned in accordance with this Plugging and Abandonment Plan at the conclusion of ISCR operations.

All abandonment notifications, approvals, procedures, documentation, and reporting required under this plan apply to all wells constructed within the commercial-scale AOR, which includes the Class III PTF wells and BHP test wells.

E.2.2 Objectives

The objectives of the Plugging and Abandonment Plan are to ensure that wells, core holes, and shafts will be plugged and sealed in a manner that will prevent the migration of injected fluids into or between USDWs, and to ensure compliance with the applicable requirements of the ADWR (Arizona Administrative Code [A.A.C.] R12-15-816 [Abandonment], and ADWR Well Abandonment Handbook) and the USEPA (40 Code of Federal Regulations [CFR] 146.10 [Plugging and Abandoning Class I-V Wells]).

E.2.3 Hydrogeologic Setting

The saturated geologic formations underlying the FCP site have been divided into three distinct water-bearing hydrostratigraphic units referred to as the Upper Basin Fill Unit (UBFU), Lower Basin Fill Unit (LBFU), and the Bedrock Oxide Unit. The UBFU and LBFU are separated by a thin, regionally extensive aquitard referred to as the Middle Fine-Grained Unit (MFGU). The injection and recovery wells will be completed in the Bedrock Oxide Unit, the uppermost zone of the bedrock complex underlying the FCP site. The injection zone extends from a point 40 feet below the top of the Bedrock Oxide Unit to the oxide/sulfide contact at the base of the Bedrock Oxide Unit. The uppermost 40 feet of the Bedrock Oxide Unit is excluded from injection and is referred to as the exclusion zone.

E.2.4 Overview of ISCR Operations

The ISCR area will be prepared for injection and recovery operations through a three-step process that includes: (a) the abandonment of core holes and existing wells (except Class III wells) within the active well field area and within 500 feet of the planned active ISCR well field area; (b) installation of injection, recovery, and observation wells as required; and (c) installation of ancillary facilities such as power and conveyance infrastructure.

The planned ISCR process involves injecting raffinate (approximately 99.5 percent water mixed with 0.5 percent sulfuric acid) through injection wells into the oxide zone of the bedrock beneath the site for the purposes of dissolving copper minerals from the ore body. The estimated injection zone is between approximately 500 feet below ground surface (bgs) to 1,185 feet bgs. The resulting copper-bearing solution will be pumped by recovery wells to the surface where copper will be removed from the solution in a solvent extraction electro winning (SX/EW) plant. The barren solution from the SX/EW plant will be re-acidified and re-injected back into the oxide zone.

Once copper concentration in the solution declines to a predetermined level, well closure will begin. Closure will consist of circulation of fresh water through the wells until groundwater has been restored to a quality that meets criteria specified in Aquifer Protection Permit (APP) No. P-101704 (the APP) and the UIC Permit. Depending on copper content, solutions produced during closure operations will be withdrawn through the recovery wells and conveyed to the SX/EW plant for processing or neutralized and pumped to one of the water impoundments.

Injection will be discontinued and the ISCR wells undergoing closure will be provisionally considered closed once constituent concentrations in groundwater pumped from the injection zone meet the closure criteria specified in the APP and the UIC Permit. Not more than 2 years following the provisional closure of an ISCR well, the well will be abandoned in accordance with procedures outlined in this plan and requirements set forth in the UIC Permit and the APP.

At the conclusion of ISCR operations, proposed Class III wells within the AOR will remain open for use in monitoring groundwater conditions until ADEQ and USEPA give approval to plug and abandon the wells. FCP ISCR Class III wells will not be plugged and abandoned until written authorization to do so has been received from both ADEQ and USEPA. Florence Copper proposes to keep one ISCR well open per resource block following rinsing to facilitate rebound monitoring of Level 1 parameters on an annual basis. These wells may also be used as recovery wells for additional rinsing if monitoring indicates additional rinsing is required. The proposed monitoring duration is 5 years, after which time the wells will be abandoned in accordance with this Plugging and Abandonment Plan.

Post-closure monitoring at the point of compliance (POC) wells, supplemental monitoring wells, and verification wells will continue following completion of formation rinsing for the period of time specified in the APP and the UIC Permit. Observation wells are installed specifically for the purpose of monitoring hydraulic control during ISCR observations. Once ISCR operations cease and formation rinsing is complete, the observation wells will no longer be required to monitor hydraulic control. No monitoring is proposed at the observation wells following the cessation of rinsing and cessation of hydraulic control. The POC wells will remain open for the period of time necessary to complete closure and post-closure monitoring specified in the APP and the UIC Permit.

E.2.5 Licenses, Notifications, and Approvals

E.2.5.1 Licensed Drillers

Abandonment procedures are described in this document and will only be performed by well drillers licensed by the ADWR pursuant to Arizona Revised Statutes § 45-595(B), or under the direction of such licensed well drillers.

E.2.5.2 Abandonment Notification and Authorization

Florence Copper will convey notice of intent to abandon a well or core hole to ADWR using Form 55-38 (*Notice of Intent to Abandon a Well*) approximately 30 days prior to the planned commencement of abandonment activities for a well or core hole. Form 55-38 will include information describing the

location, type, and construction of the well or core hole, and the proposed plugging or abandonment method.

In addition, Florence Copper will convey notice of proposed abandonment of Class III and non-Class III wells and all core holes to the USEPA on a revised copy of Form 7520-19 (*Plugging and Abandonment Plan*) approximately 60 days prior to the planned abandonment. The form will include descriptions of the proposed abandonment materials and methods of emplacement. Copies of Forms 55-38 and 7520-19 will be submitted to ADEQ concurrently with submittal to ADWR and USEPA.

Once ADWR has approved the abandonment method and materials identified on ADWR Form 55-38, ADWR will issue authorization to the driller to commence with the proposed abandonment. Authorization from ADWR will be in the form of a “well abandonment card” issued to the licensed driller. No well or core hole will be abandoned on the FCP site unless the driller has received a well abandonment card, issued by the Director of the ADWR, authorizing the abandonment of the specific well or core hole.

E.3 WELL, CORE HOLE, AND SHAFT ABANDONMENT PROCEDURES

The standard abandonment procedure will be to completely fill the well, core hole, or shaft with an appropriate sealing material, with some variation depending on the type, condition, and total depth of the well or core hole. Within the AOR, the sealing material will be Type V cement, or approved equivalent as defined in the UIC Permit. The condition and depth of each well, core hole, or shaft varies significantly. Abandonment will be considered complete when all applicable sealing steps set forth below have been completed or have been determined to be unnecessary.

E.3.1 Well or Core Hole Preparation

The following tasks will be performed to prepare each well or core hole for effective sealing.

- a. Locate and Inspect Well, Core Hole or Shaft: The well or core hole will be located using available survey coordinates. The condition and location of the well or core hole will be recorded. If the well or core hole is not visible from the surface, the area will be excavated to locate the collar of the core hole or expose the surface casing of the well. A video log will be run in each of the shafts to verify the condition of the shaft.
- b. Move in Workover Rig: A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well, core hole, or shaft.
- c. Equipment Removal: All pumps, tubing, wiring, and ancillary equipment within each well will be removed prior to abandonment of the well. No equipment exists within the core holes or shaft.
- d. Perforations: If records demonstrate that a well annulus is inadequately sealed and its casing is not removed, the casing will be perforated to allow installation of cement grout in the annulus. If necessary and the casing extends that distance, perforations will extend from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from 25 feet bgs to 5 feet bgs. Formation tops will be identified based on core hole logs, or information obtained from the site geologic model. Where the contact depth cannot be determined, the entire length of the casing will be perforated, and the entire length of the annulus will be cemented.

- e. Cleaning: Wells and core holes will be cleaned out, if necessary, to a depth of at least 100 feet below the bedrock-LBFU contact to enable proper placement of cement seals. This will be accomplished by installing a work string of tubing and circulating fluids, or drilling, or performing other remedial work as required to clean the well or core hole to the required depth. Video inspection of the shafts has shown that they are open to the required sealing depth. Following removal of ISCR-related equipment, a video log will be run in each shaft to verify that no new obstructions have been introduced into the shafts. If obstructions are observed, they will be removed using well bore fishing procedures.
- f. Equalization of Wellbore Fluids: After cleaning the well or core hole, wellbore fluids (bentonite mud) may be circulated and treated as necessary to achieve equilibrium and stabilize the hole.

E.3.2 Equipment and Materials

The following material and equipment will be used in sealing wells and core holes according to the procedure described below if required to make proper seals.

- a. Cement Grout: All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.
- b. Mechanical Plugs: A mechanical bridge plug will be set at the base of the interval to be cemented off if it is not at the bottom of the well or core hole. Alternately, the well or core hole may be filled with suitable formation stabilizer (i.e., mixture of sand and pea gravel) to support the cement seal during placement. This will prevent migration cement below the interval to be cemented and sealed. Each shaft will be filled with formation stabilizer to the required sealing depth.
- c. Cement Plugs: Cement plugs will consist of Type V cement grout or equivalent approved in accordance with the UIC Permit.
- d. Cement Retainer: If cement grout is to be installed in the annulus behind perforated casing, a cement retainer will be set above the top perforation prior to pumping cement grout into the perforated interval that has been isolated by the cement retainer.
- e. Work String: A work string of small diameter pipe or tubing (tremie pipe) will be used for the placement of cement grout and plugs.

E.3.3 General Procedure for Sealing Wells, Core Holes, and Shafts

The following procedure will be used to seal each well or core hole:

- a. If the surface casing is loose at ground surface, an attempt will be made to remove it. If removal of the casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.
- b. A tremie pipe will be used to place Type V cement in the open well, core hole, or shaft from the bottom of the hole to the top of the hole. Cement retainers, as described above, will be used to force cement grout into the annulus behind perforated intervals, as necessary.

- c. If the hole has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the hole.
- d. The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval.

E.3.4 Procedures for Special Circumstances

The following procedures will be completed for special circumstances, as indicated.

- a. Seal of Perched Aquifer: If cascading water is encountered during preparation for abandonment, the well casing in the target area will be cleaned or perforated, isolated with cement plugs, and Type V cement will be used to seal the annulus around the perched layer. Cement seals will be emplaced in four steps as follows:
 - 1. In the area of the observed cascading water, existing casing perforations in the well will be cleaned to the point that they are open and will readily allow neat cement to pass, or new perforations will be cut that will allow neat cement to pass.
 - 2. The well casing will be filled with Type V cement to a point at least 20 feet below the cascading zone and will be allowed to cure for a minimum of 12 hours.
 - 3. A packer will be emplaced above the cascading zone.
 - 4. Type V neat cement will be injected under pressure into the cascading zone until a volume of cement has been pumped that is equal to or greater than the combined volume of the well bore and the annular space within the isolated zone.
- b. Injection Wells: Injection wells plugged and abandoned in accordance with the procedures specified above will be deemed to have been plugged and abandoned in accordance with the provisions of 40 CFR 146.10. Therefore, Florence Copper will comply with the procedures specified above to ensure that any deviation from the above procedures will not violate the provisions of 40 CFR 146.10.

E.3.5 Documentation and Reporting

Following completion of plugging and abandonment, reports will be prepared and filed with the respective agencies, as described below.

E.3.5.1 Reporting Responsibilities

The licensed driller or supervised designee will maintain a log of all abandonment activities. The log will be of sufficient detail that the driller will be able to complete all ADWR requirements and all abandonment reports required by USEPA. The driller will sign all ADWR abandonment forms. The authorized Florence Copper representative will sign all narrative abandonment reports submitted to ADWR and all abandonment reports to USEPA.

E.3.5.2 Reports to ADWR

The licensed driller will complete and sign a *Well Abandonment Completion Report* (ADWR Form 55-58) and submit it to ADWR within 30 days following abandonment of any well (including Class III wells) or

core hole. Form 55-58 will update the information provided on ADWR Form 55-38 (*Notice of Intent to Abandon a Well*) including updated information on the treatment, materials, and methods used for abandoning the well or core hole. Florence Copper will complete and sign a *Well Owner's Notification of Abandonment* (ADWR Form 55-36) and submit it to ADWR within 30 days following abandonment.

E.3.5.3 Reports to USEPA

Within 60 days after plugging and abandoning a well or core hole or at the time of the next quarterly report due to the USEPA (whichever is less), Florence Copper will submit a report to the Regional Administrator of USEPA. If the quarterly report is due less than 15 days before plugging and abandonment is completed, then the report will be submitted within 60 days. The report will be certified as accurate by the licensed driller who performed the plugging and abandonment procedures.

The report will consist of either:

- A statement that the well or core hole was plugged and abandoned in accordance with the plan previously submitted to the Regional Administrator; or
- An updated version of the plan on Form 7520-19, specifying differences if the actual plugging or abandonment differed from the plan previously submitted.

The report will also include a summary of non-Class III wells and core holes abandoned and will include copies of all forms (Forms 55-38, 55-58, and 55-36) submitted to ADWR.

Completed copies of Form 7520-19 and schematic diagrams of wells, core holes, and shafts within the AOR are provided as Exhibit E-1 to this Attachment.

E.3.5.4 Reports to ADEQ

Florence Copper will include in its quarterly APP monitoring report to ADEQ a summary noting the identification number of each well or core hole for which abandonment was completed during the reporting period, the date that the abandonment was completed, and the location of the well or core hole.

Florence Copper will also submit to ADEQ a copy of the plugging and abandonment report developed for submittal to USEPA.

E.3.5.5 Maintenance of Records

Copies of all completed and required abandonment report forms, plans, and narratives required by ADWR or USEPA will be maintained at the FCP site for inspection until closure is completed. After commencement of post-closure, the records will be stored by Florence Copper, subject to review by USEPA and ADEQ, until post-closure is completed.

E.4 PLUGGING AND ABANDONMENT FORMS

The planned ISCR well field area has been divided into resource blocks to aid in well field planning. Each resource block measures 500 feet by 500 feet and covers area of approximately 5.7 acres. Because resource characterization extended beyond the edge of the ISCR well field, the resource blocks also continue beyond the edge of the well field. The ISCR well field area boundary shown on Figures A-1 and A-2 (Attachment A of this Application) reflects the cutoff selected for copper recovery based on ore body characteristics. A total of 50 resource blocks fall either fully or partly inside the ISCR well field area. The proposed ISCR wells located within the ISCR well field are listed by resource block on Tables E-1 through E-50, provided in Exhibit E-1.

Each of the planned ISCR wells will be constructed based on site-specific geologic information developed during drilling and logging of the individual bore hole that the well will be constructed in. Specific information developed includes lithologic logging, caliper, gamma-ray, temperature, directional survey, and electrical logs. This information will be used to adjust the location of well seals, injection intervals, and eventually plugs based on this geologic information. By contrast, the well diagrams and plugging and abandonment forms (USEPA Form 7520-19) included in Exhibit E-1 reflect preliminary well designs based on core hole data, with interpolation in areas between core holes. The core hole information was also used to develop the resource blocks shown on Attachment A, Figures A-1 and A-2 of this Application. Based on the information presently available, the planned ISCR wells to be constructed in each resource block will be of a similar depth and will feature a similar seal interval and injection zone interval. Consequently, one plugging and abandonment form was prepared for each resource block. Each plugging and abandonment form includes one well diagram for injection and recovery wells, and another for perimeter and observation wells for blocks that include both types of wells. Coordinates for each well location are provided in tabular format (Tables E-1 through E-50) with each plugging and abandonment form (Exhibit E-1). Tables E-1 through E-50 include well information for a total of 1,757 injection and recovery wells, 87 perimeter wells, and 44 observation wells.

Corrective action will be taken to prevent the migration of injected fluids between or into USDWs within or adjacent to the AOR. Corrective action includes plugging and abandonment of all wells and core holes within the AOR, with the exception of Class III wells, prior to placing an injection well into operation within 500 feet of the well or core hole. The wells and core holes will be plugged and abandoned in accordance with this Plugging and Abandonment Plan. All non-Class III wells currently existing within the AOR, and which will be plugged and abandoned prior to injection within 500 feet, are listed in Table A-7. Plugging and abandonment forms (USEPA Form 7520-19) for each of the wells listed in Table A-7 are included in Exhibit E-2. Plugging and abandonment forms (USEPA Form 7520-19) for the two Conoco shafts are included in Exhibit E-2. All open core holes currently existing within the AOR and which will be plugged and abandoned prior to injection within 500 feet are listed in Table A-8. Plugging and abandonment forms (USEPA Form 7520-19) for each of the core holes listed in Table A-8 are included in Exhibit E-3. Plugging and abandonment forms (USEPA Form 7520-19) for the BHP Class III wells listed in Table A-6 are included in Exhibit E-4.

E.5 PLUGGING AND ABANDONMENT COST ESTIMATE

A cost estimate for plugging and abandonment is included with the estimated closure and post-closure costs provided in Attachment F of this Application.

EXHIBIT E-1

**Form 7520-19, Schematic Diagrams of Planned
Class III ISCR Wells by Resource Block**

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 19 Wells - See Attached Table E-1

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.053291

Surface Location

SW 1/4 of NW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.435439

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 19. There are 11 Class III multi-use injection/ recovery wells, 1 dedicated Class III observation, and 3 Class III perimeter wells planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out. The dedicated perimeter observation well will have a design and depth similar to the injection and recovery wells, but will not have a segmented well screen.

The work performed includes plugging and abandonment of the Class III wells in resource block 19. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figures E-1a and E-1b.

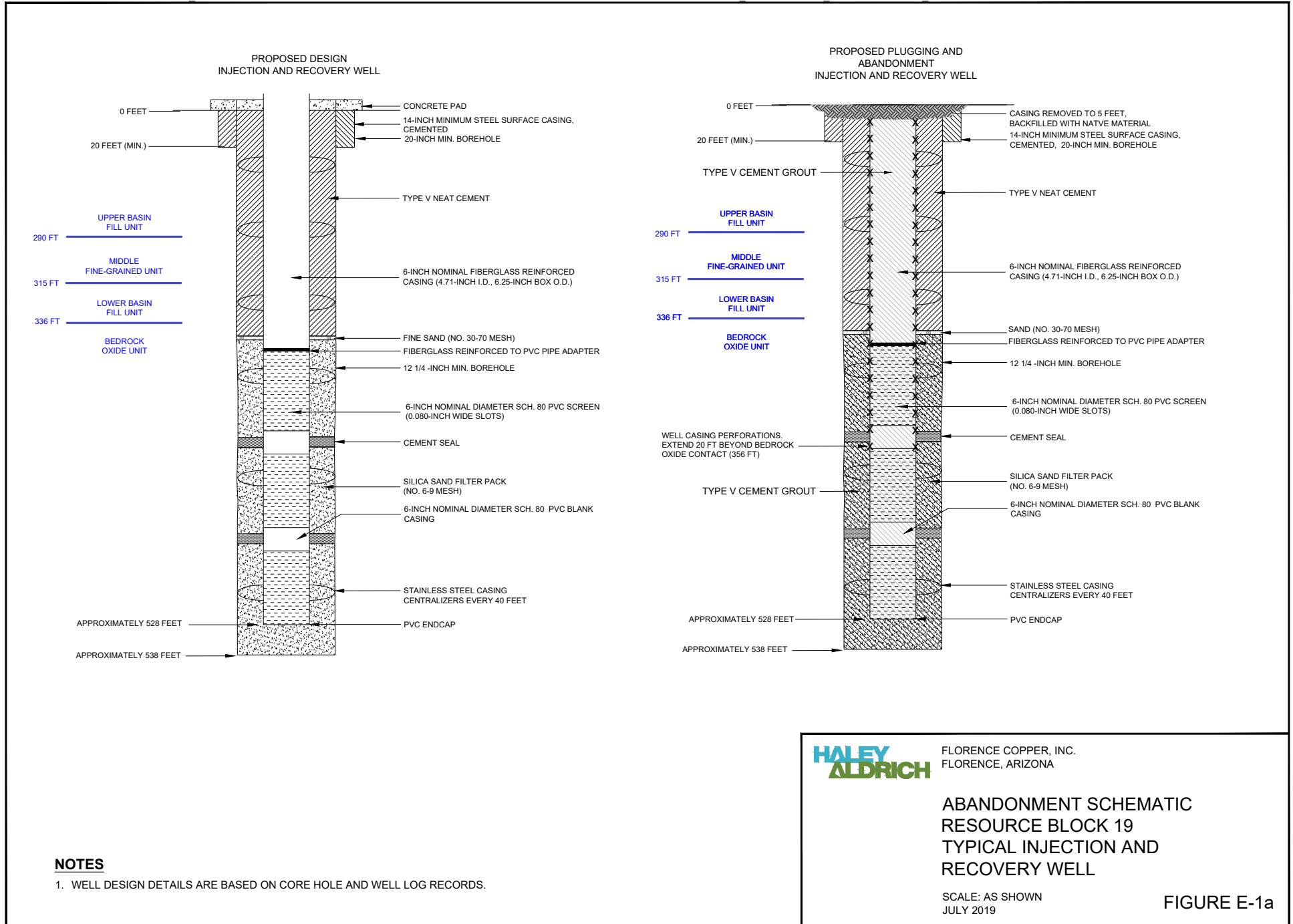
Certification

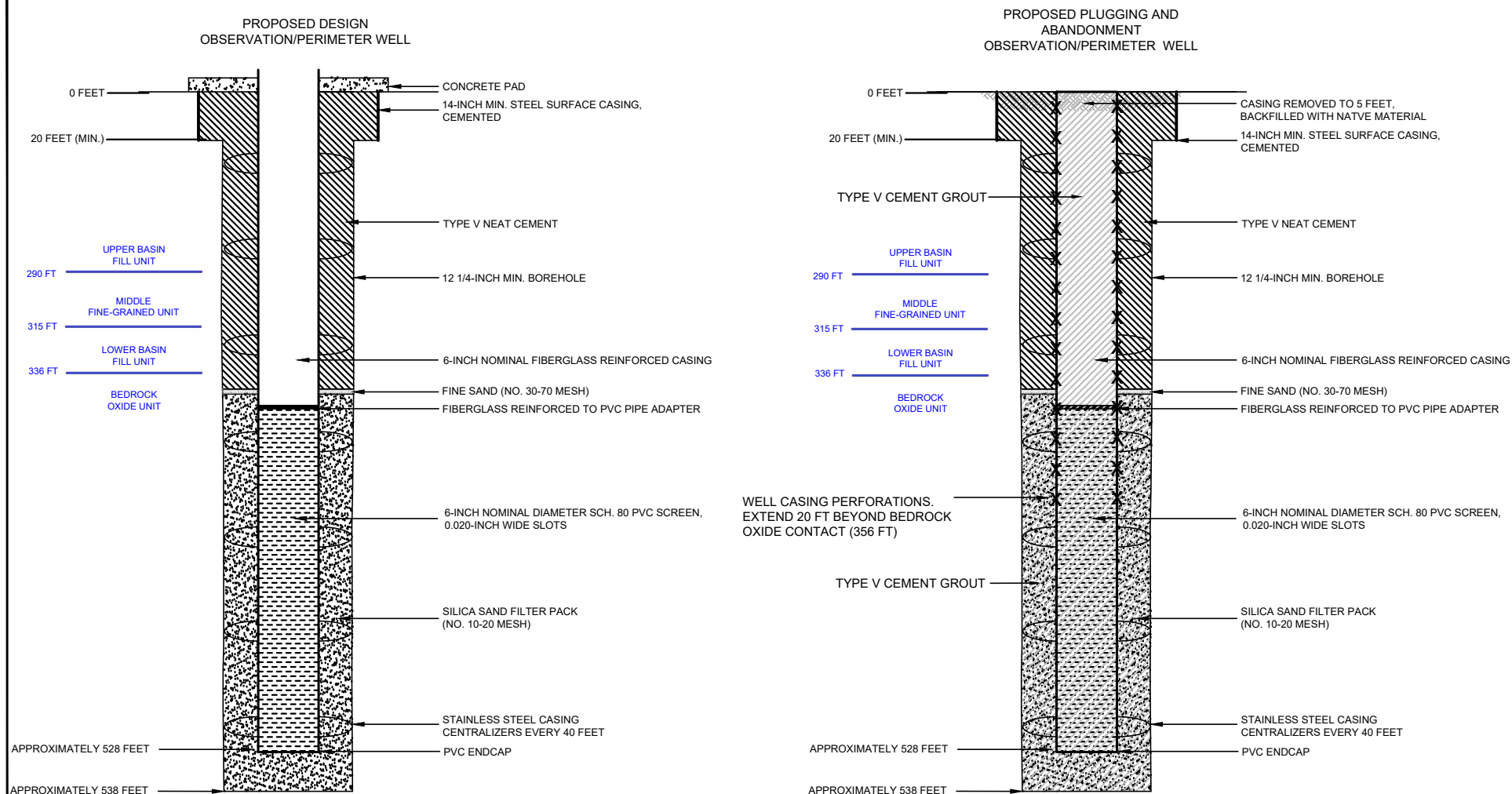
I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed





NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 19 OBSERVATION/PERIMETER WELL

JULY 2019
SCALE: AS SHOWN

FIGURE E-1b

TABLE E-1
WELLS WITHIN RESOURCE BLOCK 19
 FLORENCE COPPER PROJECT
 FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
566	847412	747121	19	336	376	528
567	847483	747192	19	336	376	528
583	847341	747050	19	336	376	528
873	847341	747121	19	336	376	528
874	847341	747192	19	336	376	528
875	847270	747121	19	336	376	528
921	847389	747205	19	336	376	528
922	847289	747205	19	336	376	528
923	847339	747255	19	336	376	528
569	847483	747121	19	336	376	528
587	847412	747050	19	336	376	528
O01	847408	747389	19	336	376	528
P01	847337	747319	19	336	376	528
P02	847479	747319	19	336	376	528
P03	847695	747333	19	336	376	528

Notes:

ft bgs = feet below ground surface

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 20 Wells - See Attached Table E-2

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.052763

Surface Location

NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.433440

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 20. There are 6 Class III multi-use injection/ recovery wells, 2 dedicated Class III observation, and 3 Class III perimeter wells planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out. The dedicated perimeter observation well will have a design and depth similar to the injection and recovery wells, but will not have a segmented well screen.

The work performed includes plugging and abandonment of the Class III wells in resource block 20. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figures E-2a and E-2b.

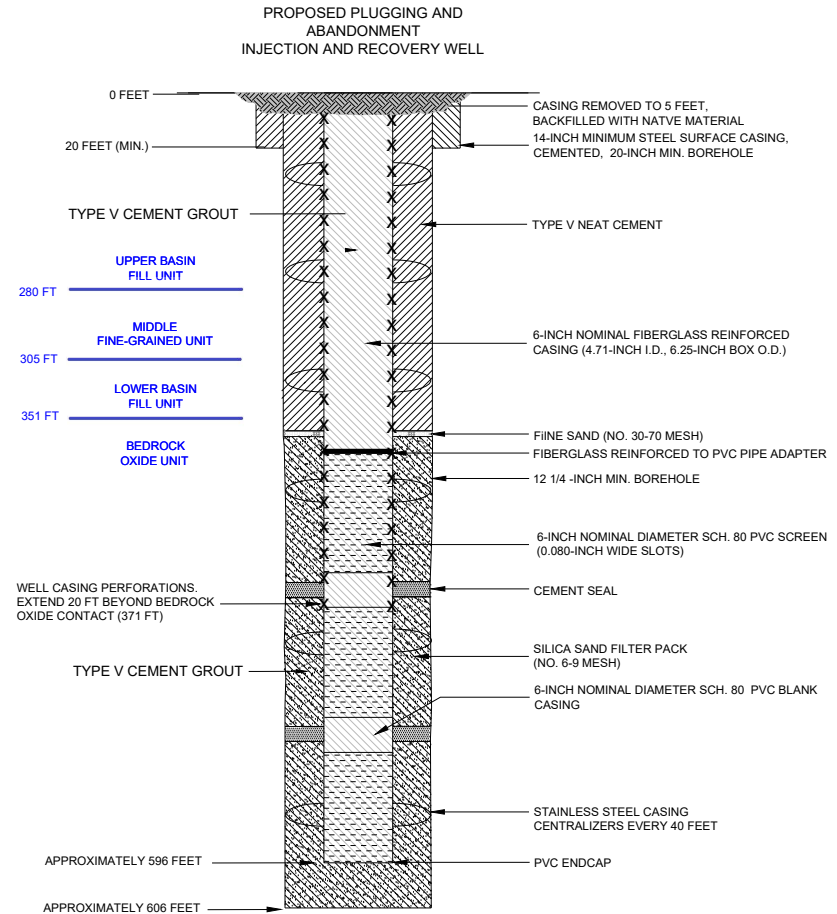
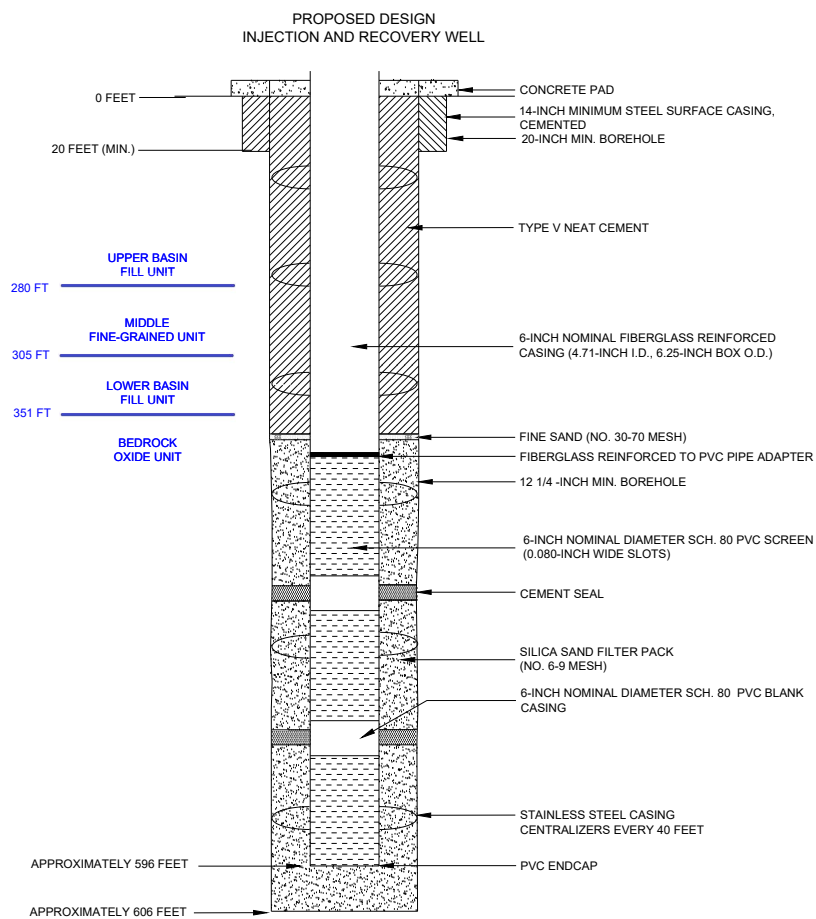
Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

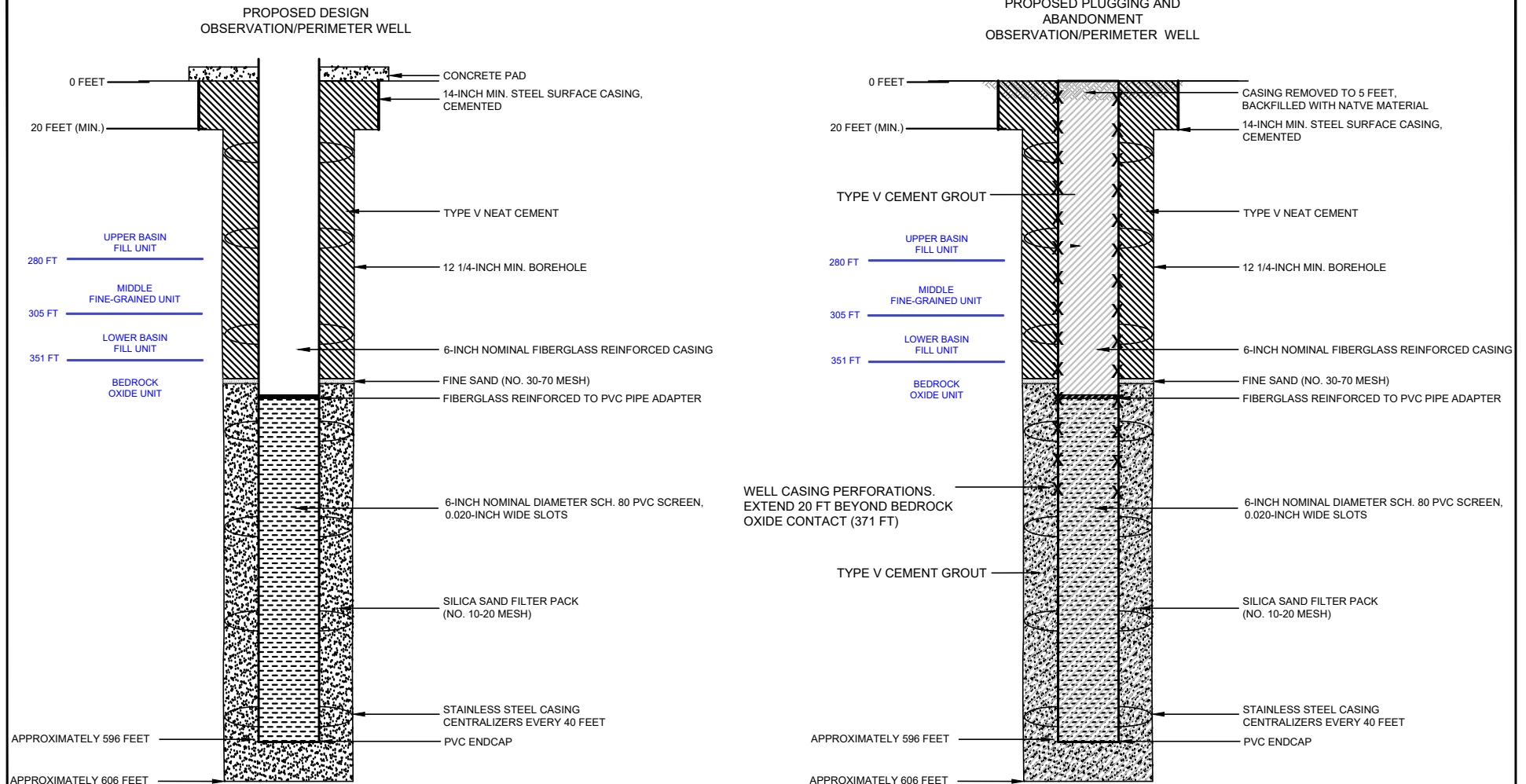


FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 20 TYPICAL INJECTION AND RECOVERY WELL

SCALE: AS SHOWN
JULY 2019

FIGURE E-2a



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 20 OBSERVATION/PERIMETER WELL

JULY 2019
SCALE: AS SHOWN

FIGURE E-2b

TABLE E-2
WELLS WITHIN RESOURCE BLOCK 20
 FLORENCE COPPER PROJECT
 FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
632	848119	747050	20	351	391	596
602	847978	747121	20	351	391	596
605	848190	747121	20	351	391	596
606	848048	747121	20	351	391	596
607	848119	747121	20	351	391	596
633	848048	747050	20	351	391	596
O02	847765	747333	20	351	391	596
O03	847978	747263	20	351	391	596
P05	847907	747192	20	351	391	596
P06	848048	747192	20	351	391	596
P07	848190	747192	20	351	391	596

Notes:

ft bgs = feet below ground surface

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 21 Wells - See Attached Table E-3

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.052742

Surface Location

NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.431160

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 21. There are 6 Class III multi-use injection/ recovery wells, 1 dedicated Class III observation, and 3 Class III perimeter wells planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out. The dedicated perimeter observation well will have a design and depth similar to the injection and recovery wells, but will not have a segmented well screen.

The work performed includes plugging and abandonment of the Class III wells in resource block 21. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figures E-3a and E-3b.

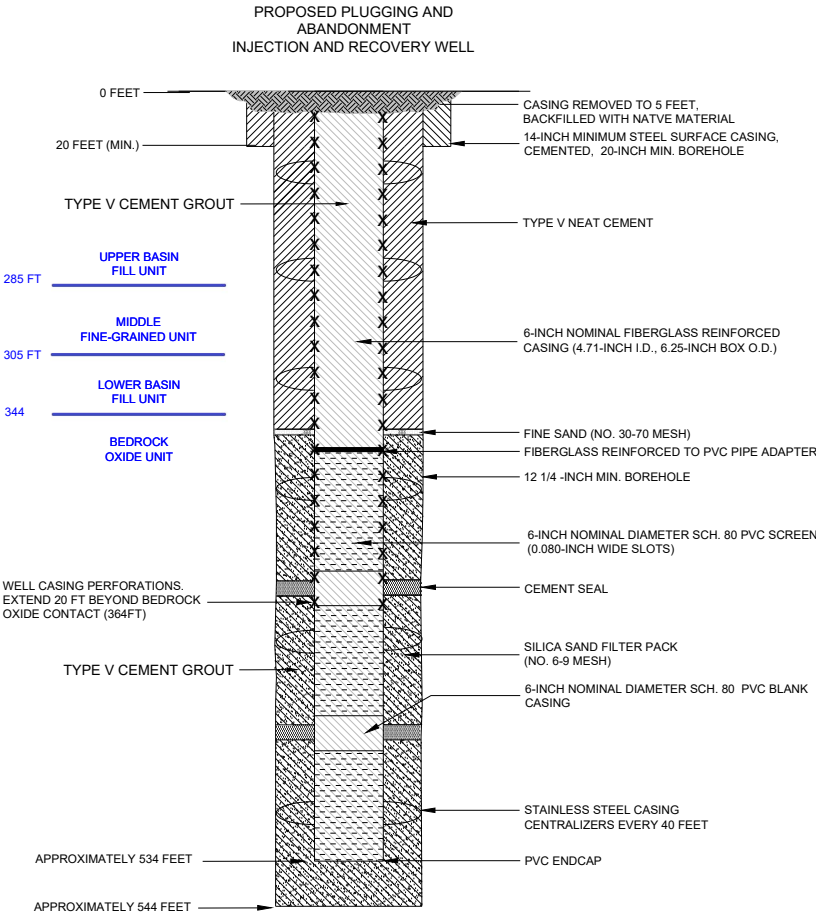
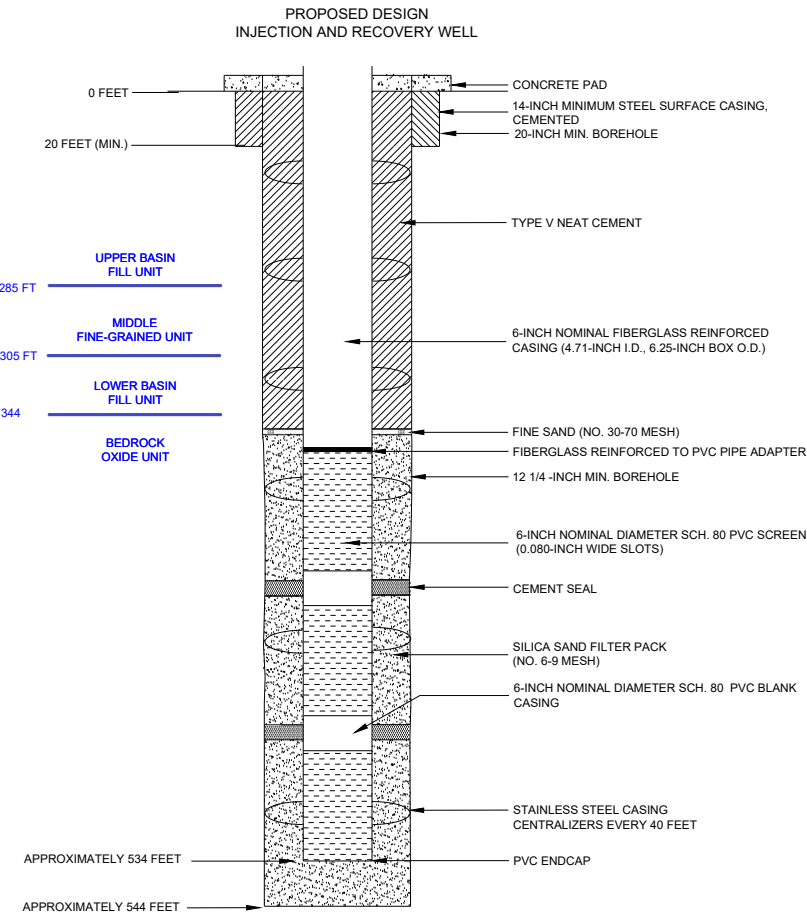
Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

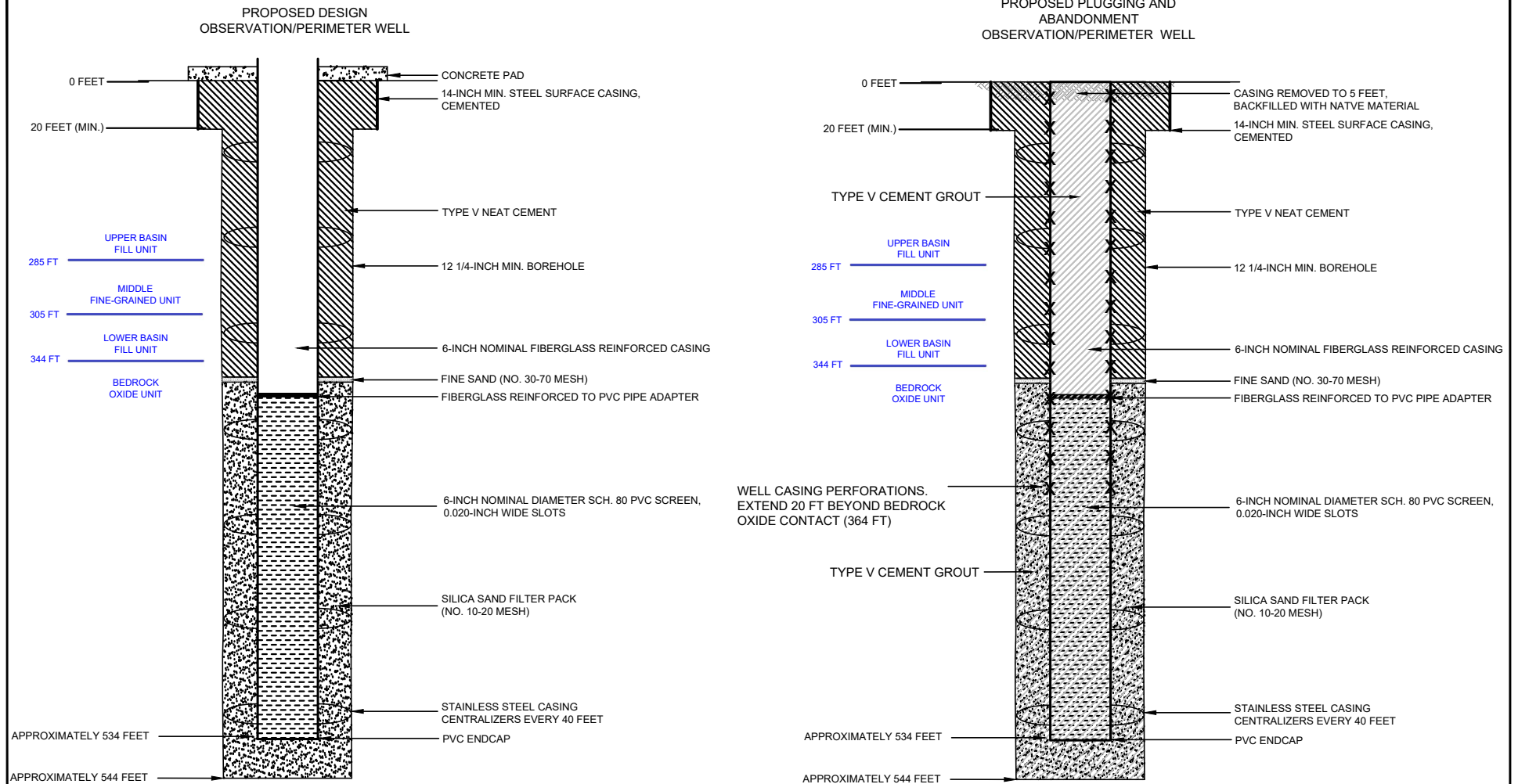


FLORENCE COPPER, INC.
FLORENCE, ARIZONA

**ABANDONMENT SCHEMATIC
RESOURCE BLOCK 21
TYPICAL INJECTION AND
RECOVERY WELL**

SCALE: AS SHOWN
JULY 2019

FIGURE E-3a



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

**HALEY
ALDRICH**

FLORENCE COPPER, INC.
 FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 21 OBSERVATION/PERIMETER WELL

JULY 2019
 SCALE: AS SHOWN

FIGURE E-3b

TABLE E-3
WELLS WITHIN RESOURCE BLOCK 21
 FLORENCE COPPER PROJECT
 FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
11	848826	747050	21	344	384	534
6	848755	747051	21	344	384	534
8	848897	747121	21	344	384	534
10	848826	747121	21	344	384	534
132	848754	747121	21	344	384	534
133	848684	747121	21	344	384	534
O05	848755	747263	21	344	384	534
P09	848685	747192	21	344	384	534
P10	848826	747192	21	344	384	534
P11	848967	747192	21	344	384	534

Notes:

ft bgs = feet below ground surface

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 22 Wells - See Attached Table E-4

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.052757

Surface Location

NE 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.428766

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 22. There are 4 Class III multi-use injection/recovery wells, 2 dedicated Class III observation, and 3 Class III perimeter wells planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out. The dedicated perimeter observation well will have a design and depth similar to the injection and recovery wells, but will not have a segmented well screen.

The work performed includes plugging and abandonment of the Class III wells in resource block 22. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figures E-4a and E-4b.

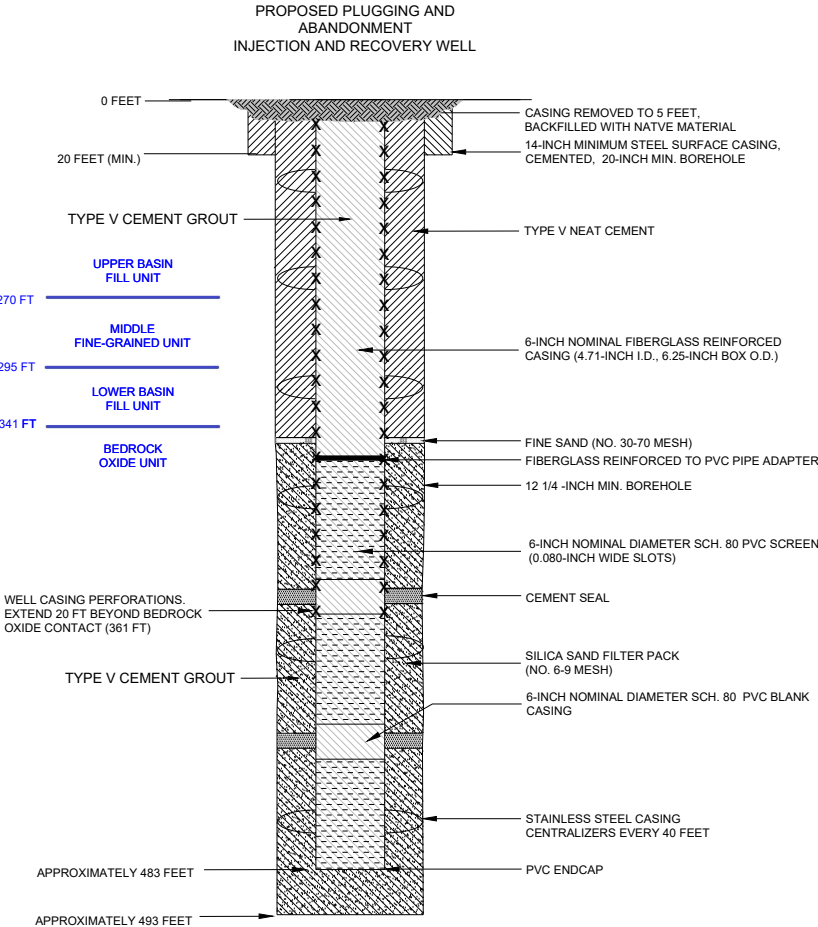
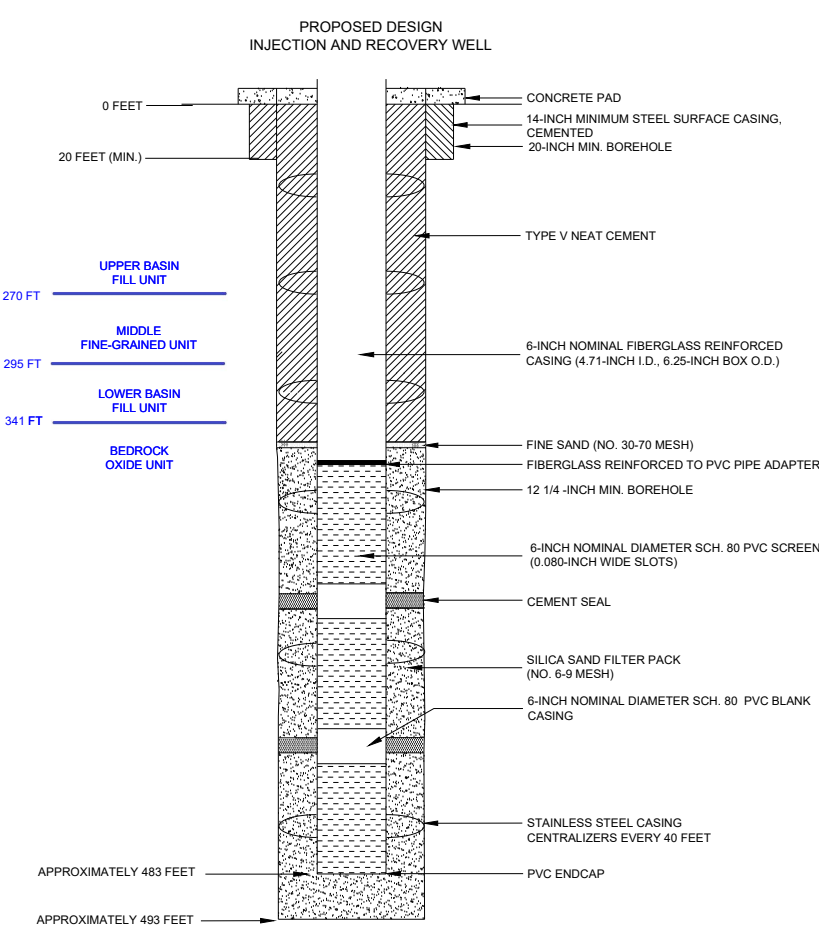
Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

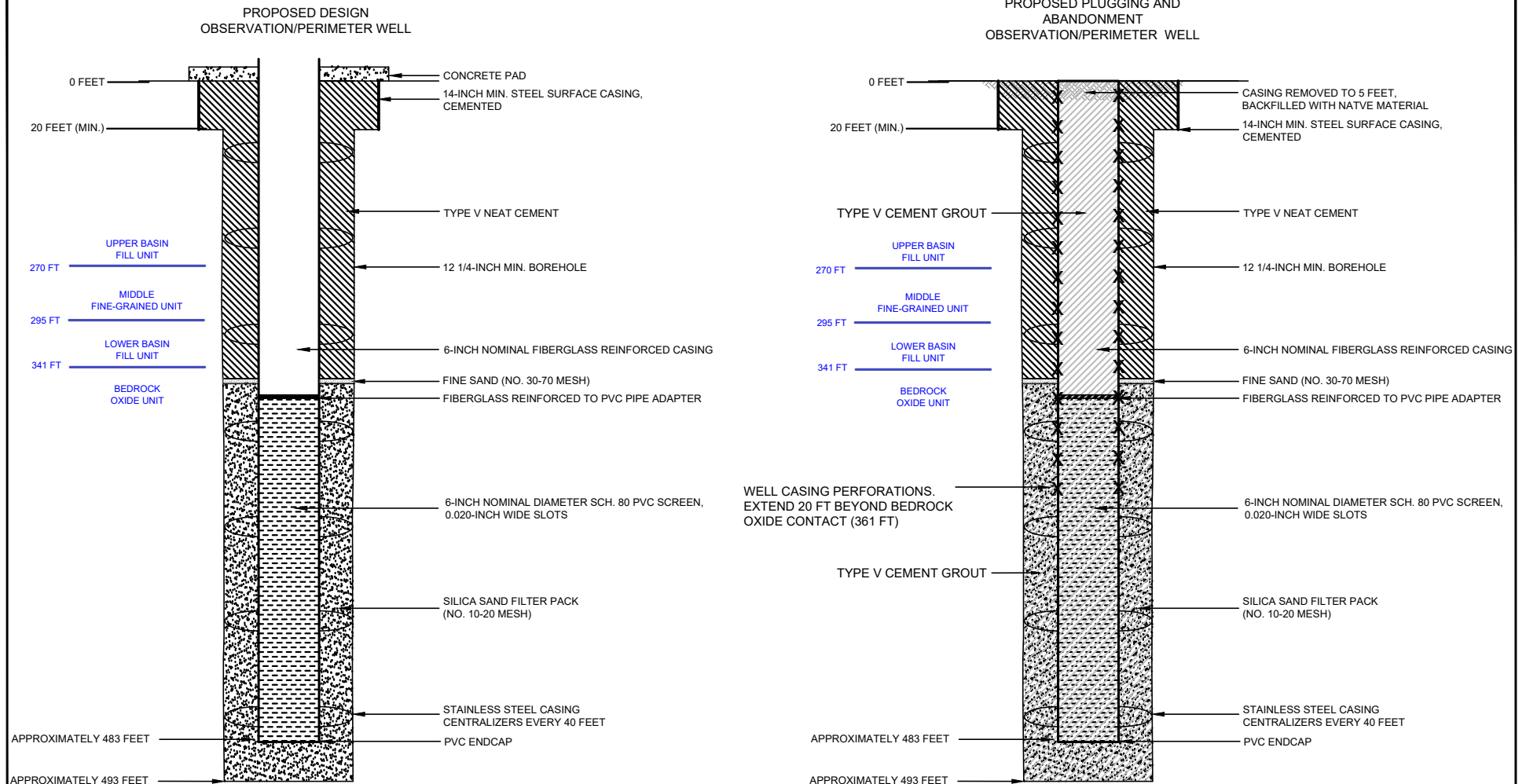


FLORENCE COPPER, INC.
FLORENCE, ARIZONA

**ABANDONMENT SCHEMATIC
RESOURCE BLOCK 22
TYPICAL INJECTION AND
RECOVERY WELL**

SCALE: AS SHOWN
JULY 2019

FIGURE E-4



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 22 OBSERVATION/PERIMETER WELL

JULY 2019
SCALE: AS SHOWN

FIGURE E-4b

TABLE E-4
WELLS WITHIN RESOURCE BLOCK 22
 FLORENCE COPPER PROJECT
 FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
301	849533	747050	22	341	381	483
302	849604	747121	22	341	381	483
313	849533	747121	22	341	381	483
314	849462	747050	22	341	381	483
O07	849322	747263	22	341	381	483
O08	849605	747263	22	341	381	483
P14	849393	747192	22	341	381	483
P15	849534	747192	22	341	381	483
P16	849675	747192	22	341	381	483

Notes:

ft bgs = feet below ground surface

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 27 Wells - See Attached Table E-5

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.052352

Surface Location

Longitude -111.436308

NW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 27. There are 16 Class III multi-use injection/ recovery wells, 2 dedicated Class III observation, and 5 Class III perimeter wells planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out. The dedicated perimeter observation well will have a design and depth similar to the injection and recovery wells, but will not have a segmented well screen.

The work performed includes plugging and abandonment of the Class III wells in resource block 27. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figures E-5a and E-5b.

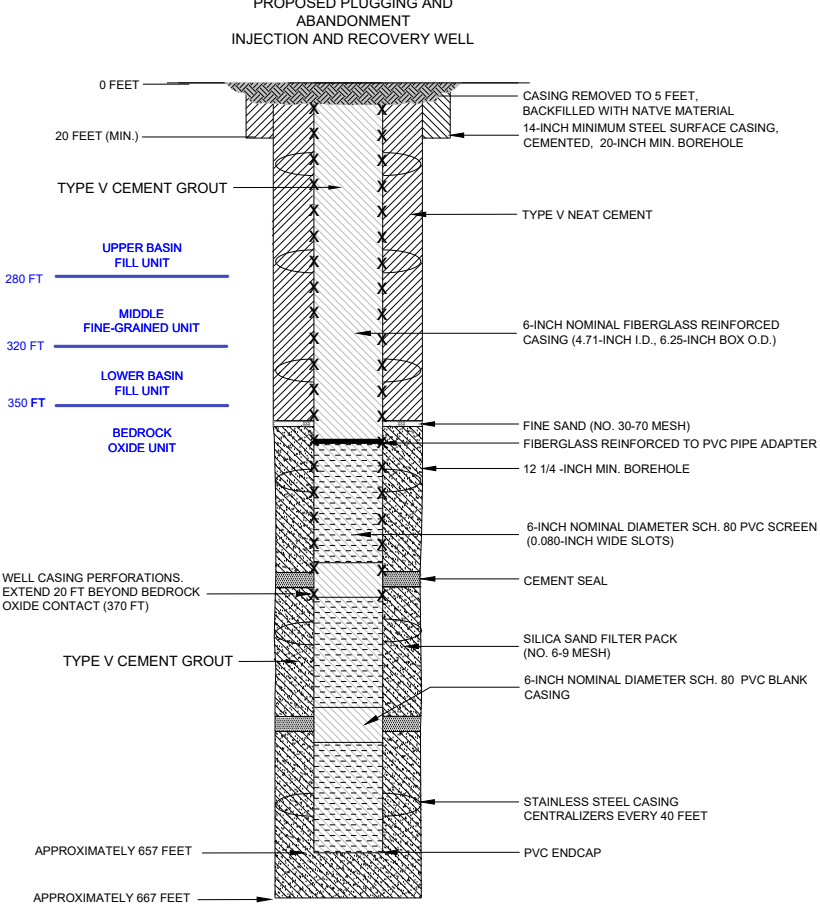
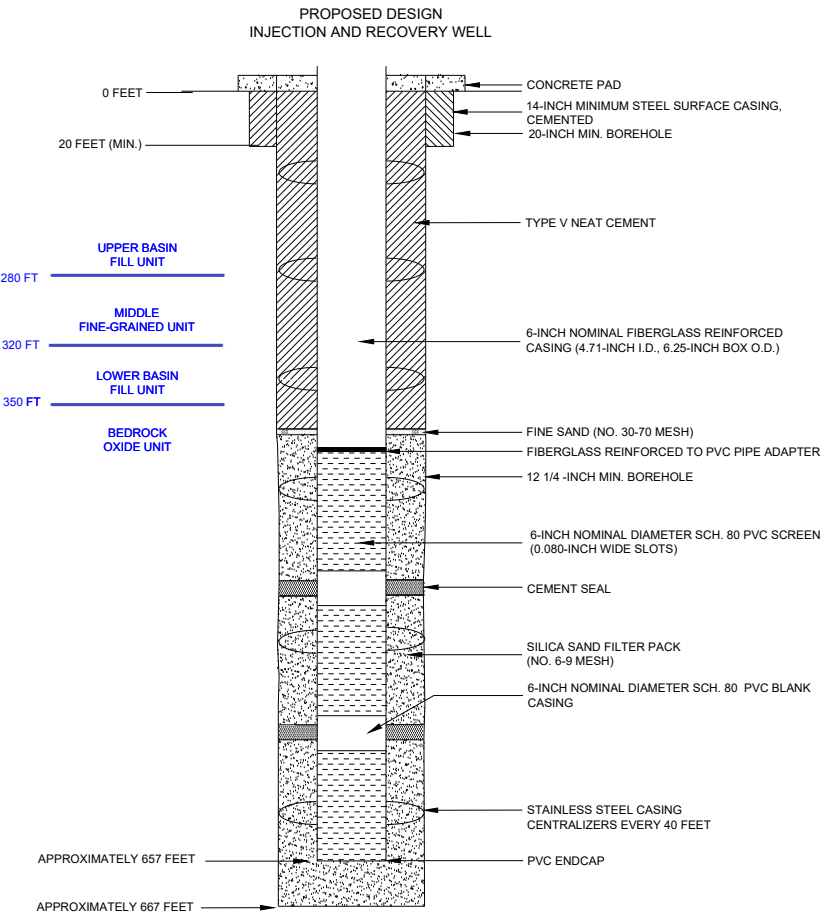
Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

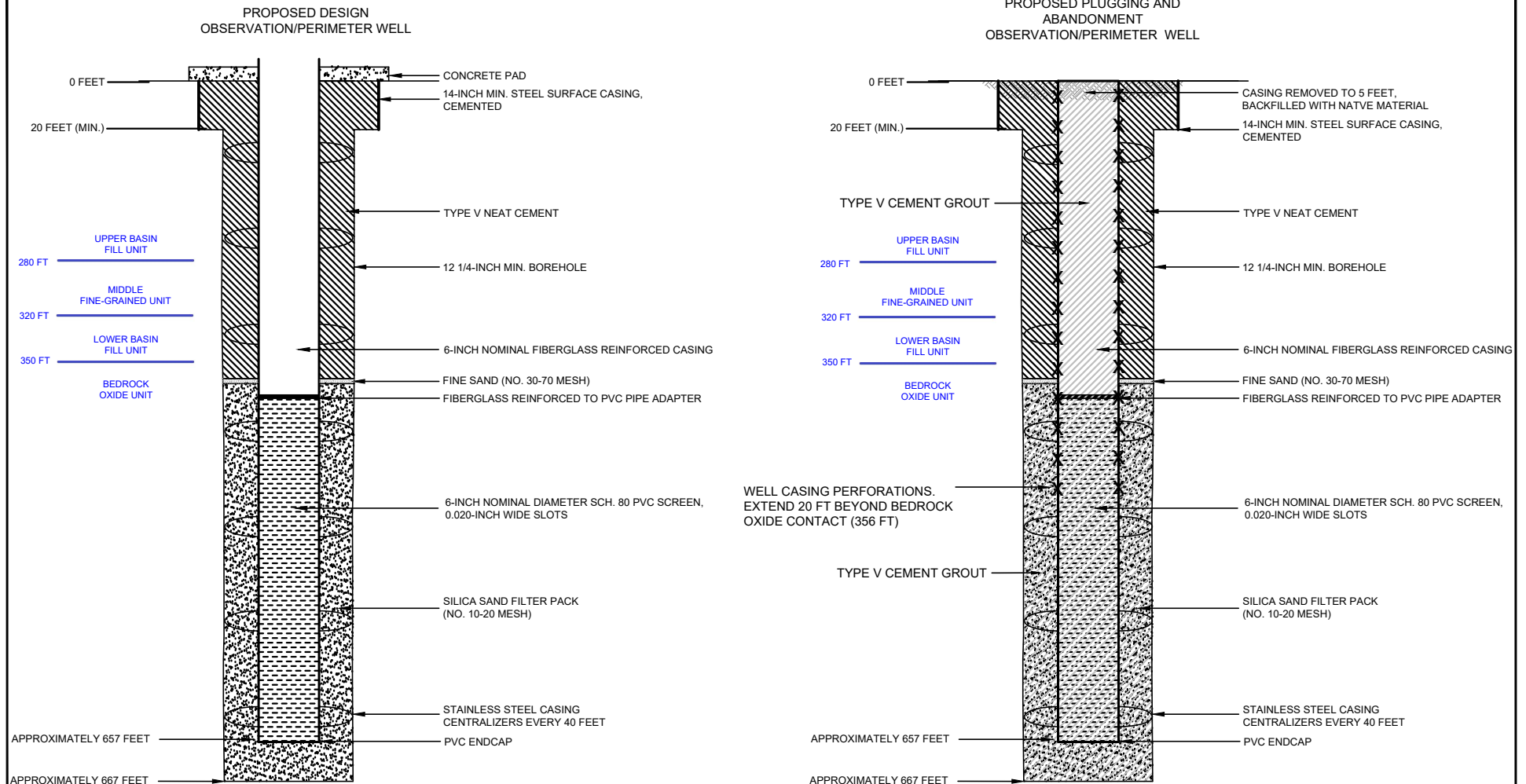


FLORENCE COPPER, INC.
FLORENCE, ARIZONA

**ABANDONMENT SCHEMATIC
RESOURCE BLOCK 27
TYPICAL INJECTION AND
RECOVERY WELL**

SCALE: AS SHOWN
JULY 2019

FIGURE E-5a



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.



FLORENCE COPPER, INC.
 FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 27 OBSERVATION/PERIMETER WELL

JULY 2019
 SCALE: AS SHOWN

FIGURE E-5b

TABLE E-5
WELLS WITHIN RESOURCE BLOCK 27
 FLORENCE COPPER PROJECT
 FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
719	847129	746768	27	350	390	657
723	847129	746838	27	350	390	657
881	847129	746909	27	350	390	657
883	847129	746980	27	350	390	657
718	847058	746697	27	350	390	657
720	847200	746838	27	350	390	657
722	847200	746909	27	350	390	657
882	847200	746980	27	350	390	657
584	847270	746980	27	350	390	657
721	847270	746909	27	350	390	657
580	847341	746980	27	350	390	657
916	847200	747050	27	350	390	657
920	847270	747050	27	350	390	657
924	847129	747050	27	350	390	657
925	847200	747121	27	350	390	657
926	847129	747121	27	350	390	657
O43	846988	746909	27	350	390	657
O44	847059	747192	27	350	390	657
P83	846988	746697	27	350	390	657
P84	847058	746838	27	350	390	657
P85	847058	746980	27	350	390	657
P86	847059	747121	27	350	390	657
P87	847129	747192	27	350	390	657

Notes:

ft bgs = feet below ground surface

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 28 Wells - See Attached Table E-6

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.052554

Surface Location

NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.434624

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 28. There are 49 Class III multi-use injection/ recovery wells and 1 dedicated Class III observation well planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out. The dedicated observation well will have a design and depth similar to the injection and recovery wells, but will not have a segmented well screen.

The work performed includes plugging and abandonment of the Class III wells in resource block 28. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figures E-6a and E-6b.

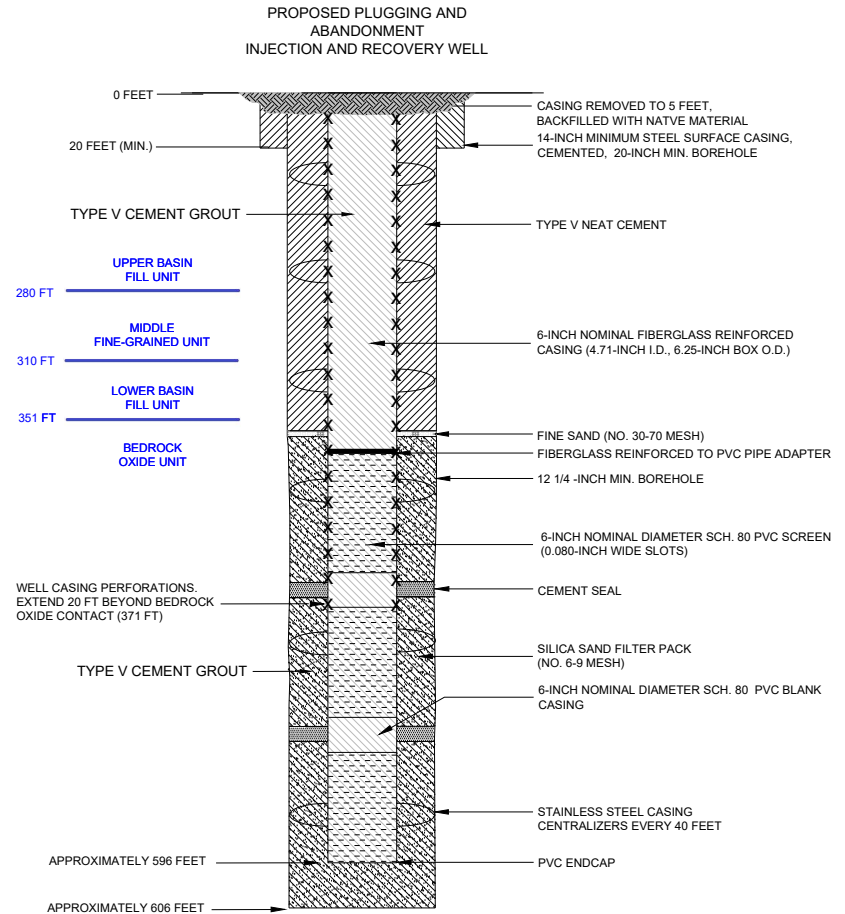
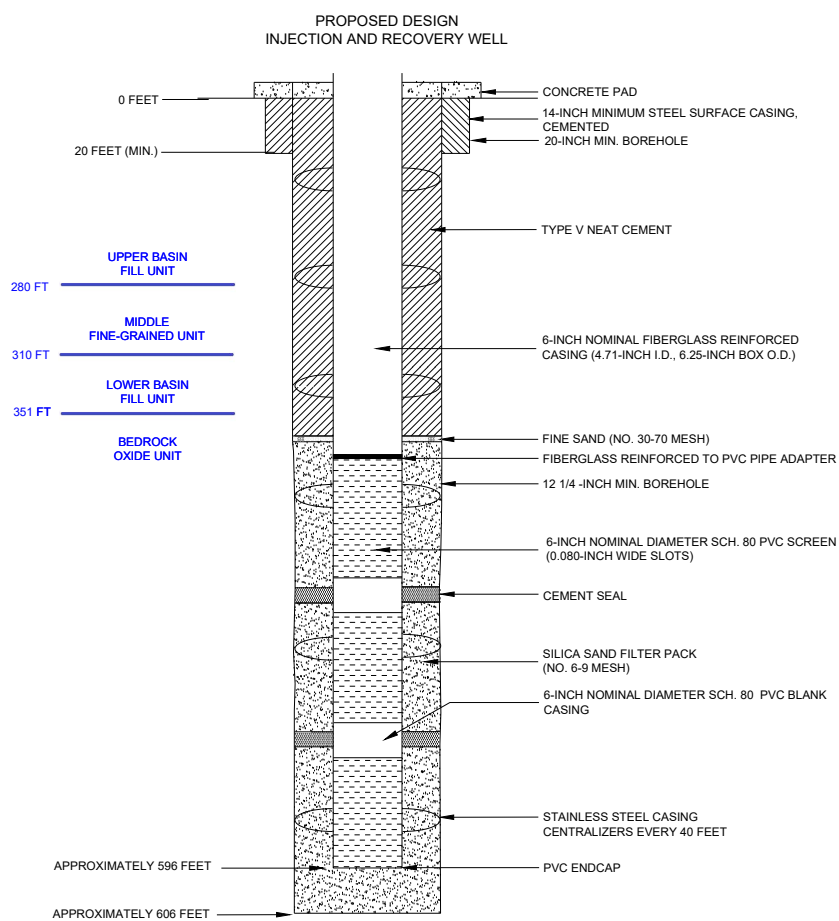
Certification

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Name and Official Title (Please type or print)

Signature

Date Signed



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

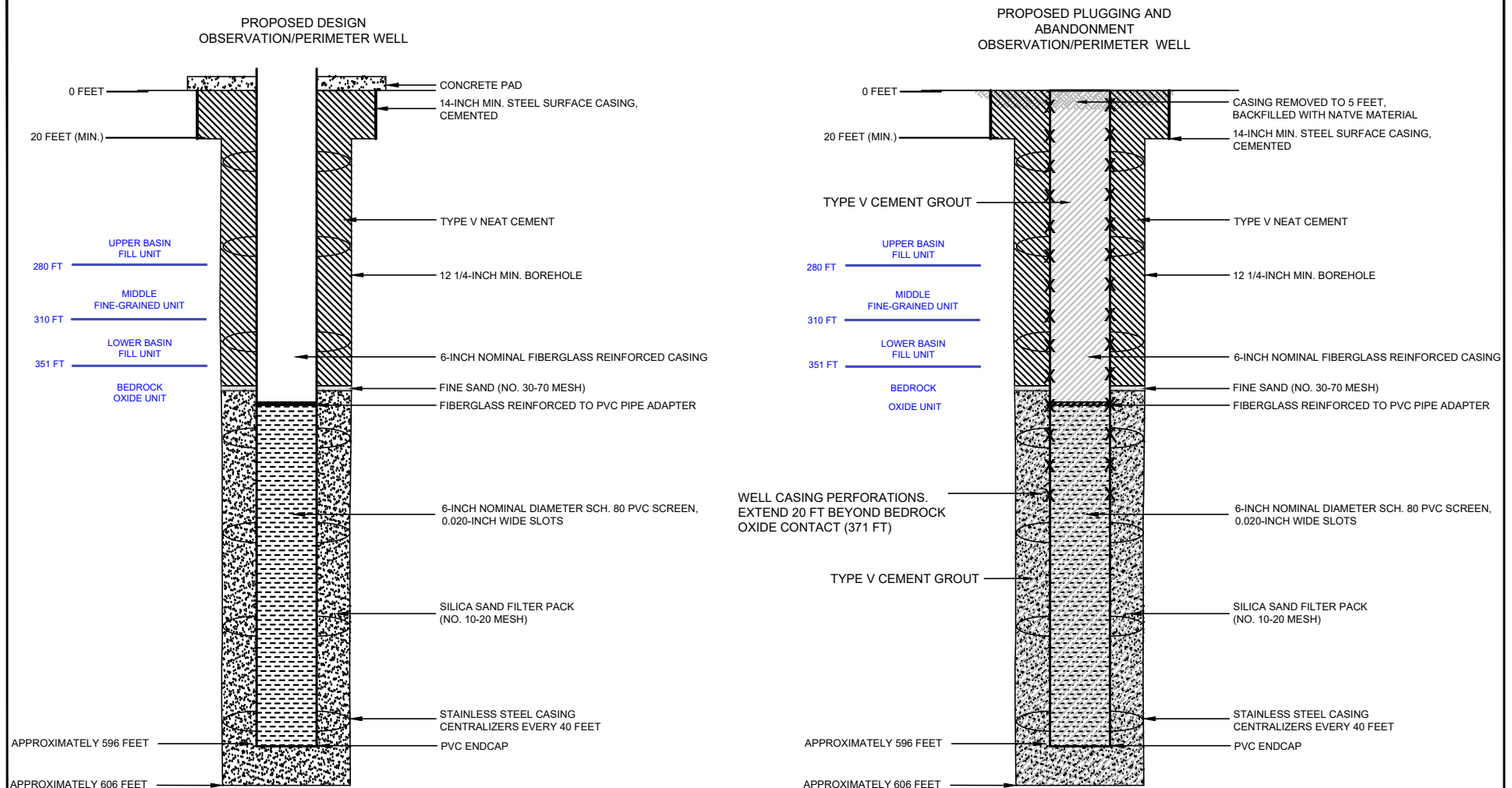
**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 28 TYPICAL INJECTION AND RECOVERY WELL

SCALE: AS SHOWN
JULY 2019

FIGURE E-6a



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 28 OBSERVATION/PERIMETER WELL

JULY 2019
SCALE: AS SHOWN

FIGURE E-6b

TABLE E-6
WELLS WITHIN RESOURCE BLOCK 28
 FLORENCE COPPER PROJECT
 FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
517	847695	746697	28	351	391	596
570	847624	747121	28	351	391	596
568	847553	747121	28	351	391	596
571	847624	747192	28	351	391	596
575	847553	746838	28	351	391	596
578	847483	746909	28	351	391	596
581	847412	746980	28	351	391	596
585	847553	747050	28	351	391	596
586	847483	747050	28	351	391	596
588	847553	746980	28	351	391	596
705	847622	747255	28	351	391	596
703	847672	747205	28	351	391	596
704	847572	747205	28	351	391	596
634	848048	746980	28	351	391	596
631	847978	746909	28	351	391	596
630	847907	746980	28	351	391	596
629	847978	746980	28	351	391	596
628	847836	747050	28	351	391	596
627	847907	747050	28	351	391	596
626	847978	747050	28	351	391	596
625	847695	747050	28	351	391	596
624	847695	746980	28	351	391	596
623	847765	747050	28	351	391	596
622	847695	746838	28	351	391	596
621	847765	746909	28	351	391	596
619	847765	746980	28	351	391	596
620	847836	746980	28	351	391	596
618	847695	746909	28	351	391	596
617	847765	746768	28	351	391	596
589	847483	746980	28	351	391	596
590	847553	746909	28	351	391	596
591	847624	746768	28	351	391	596
593	847625	746837	28	351	391	596
594	847624	746909	28	351	391	596
595	847624	747050	28	351	391	596
596	847624	746980	28	351	391	596
597	847836	747121	28	351	391	596
599	847765	747121	28	351	391	596
600	847765	747192	28	351	391	596

TABLE E-6
WELLS WITHIN RESOURCE BLOCK 28
 FLORENCE COPPER PROJECT
 FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
601	847695	747121	28	351	391	596
603	847907	747121	28	351	391	596
610	847836	746768	28	351	391	596
609	847765	746697	28	351	391	596
611	847907	746838	28	351	391	596
612	847695	746768	28	351	391	596
613	847765	746838	28	351	391	596
614	847836	746909	28	351	391	596
615	847907	746909	28	351	391	596
616	847836	746838	28	351	391	596
P04	847765	747263	28	351	391	596

Notes:

ft bgs = feet below ground surface

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 29 Wells - See Attached Table E-7

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.052289

Surface Location

NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.432285

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 29. There are 35 Class III multi-use injection/ recovery wells, 1 dedicated Class III observation, and 1 Class III perimeter wells planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out. The dedicated perimeter observation well will have a design and depth similar to the injection and recovery wells, but will not have a segmented well screen.

The work performed includes plugging and abandonment of the Class III wells in resource block 29. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figures E-7a and E-7b.

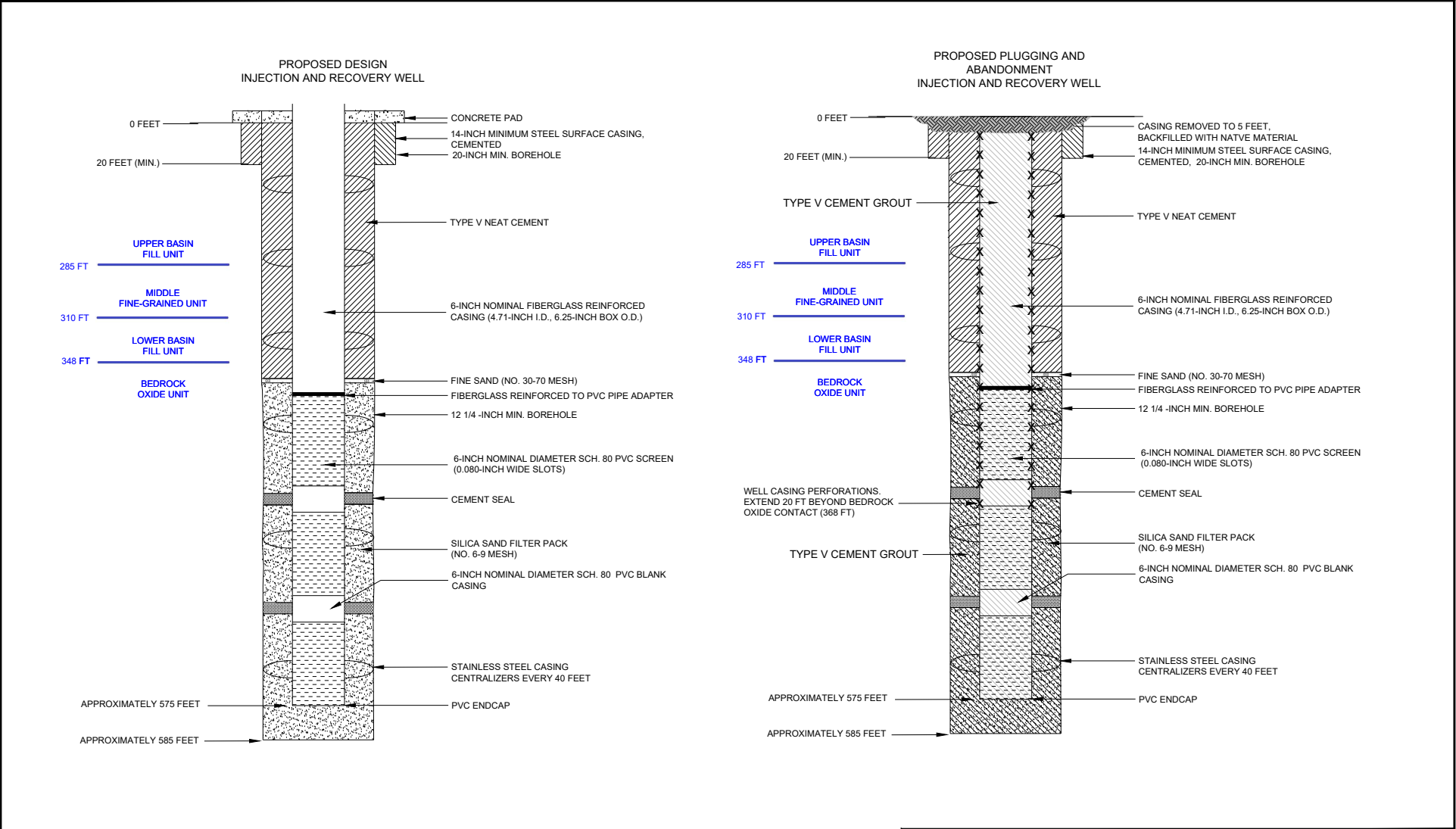
Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)


Name and Official Title (Please type or print)

Signature

Date Signed



NOTES
1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

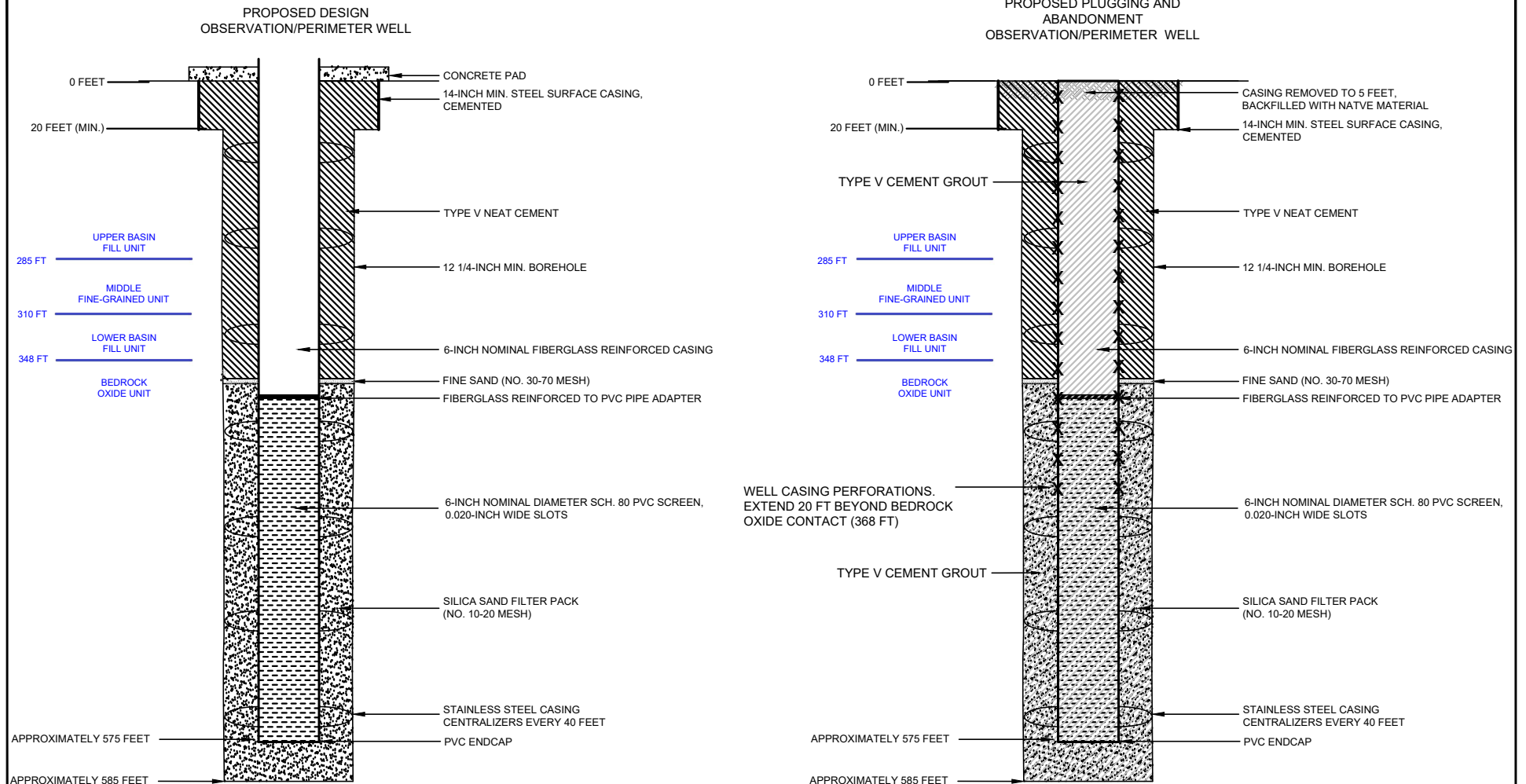


FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC
RESOURCE BLOCK 29
TYPICAL INJECTION AND
RECOVERY WELL

SCALE: AS SHOWN
JULY 2019

FIGURE E-7a



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 29 OBSERVATION/PERIMETER WELL

JULY 2019
SCALE: AS SHOWN

FIGURE E-7b

TABLE E-7
WELLS WITHIN RESOURCE BLOCK 29
 FLORENCE COPPER PROJECT
 FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
1	848614	746838	29	348	388	575
2	848614	746909	29	348	388	575
3	848557	746838	29	348	388	575
4	848685	746980	29	348	388	575
5	848685	746909	29	348	388	575
7	848755	746980	29	348	388	575
131	848684	747050	29	348	388	575
635	848260	747121	29	348	388	575
643	848543	746768	29	348	388	575
646	848543	746909	29	348	388	575
651	848331	746838	29	348	388	575
652	848402	746909	29	348	388	575
653	848472	746980	29	348	388	575
654	848543	746980	29	348	388	575
656	848369	746838	29	348	388	575
655	848508	746934	29	348	388	575
657	848331	746768	29	348	388	575
662	848331	746909	29	348	388	575
660	848472	747050	29	348	388	575
661	848402	746980	29	348	388	575
663	848260	746838	29	348	388	575
668	848260	746909	29	348	388	575
669	848331	746980	29	348	388	575
670	848331	747050	29	348	388	575
671	848260	746980	29	348	388	575
672	848190	746909	29	348	388	575
684	848260	747050	29	348	388	575
685	848190	747050	29	348	388	575
686	848190	746980	29	348	388	575
687	848119	746980	29	348	388	575
688	848614	747050	29	348	388	575
689	848614	746980	29	348	388	575
709	848521	747064	29	348	388	575
710	848421	747064	29	348	388	575
711	848471	747114	29	348	388	575
O04	848331	747263	29	348	388	575
P08	848473	747192	29	348	388	575

Notes:

ft bgs = feet below ground surface

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 30 Wells - See Attached Table E-8

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.052368

Surface Location

NW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.429986

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 30. There are 44 Class III multi-use injection/ recovery wells, 1 dedicated Class III observation, and 2 Class III perimeter wells planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out. The dedicated perimeter observation well will have a design and depth similar to the injection and recovery wells, but will not have a segmented well screen.

The work performed includes plugging and abandonment of the Class III wells in resource block 30. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figures E-8a and E-8b.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

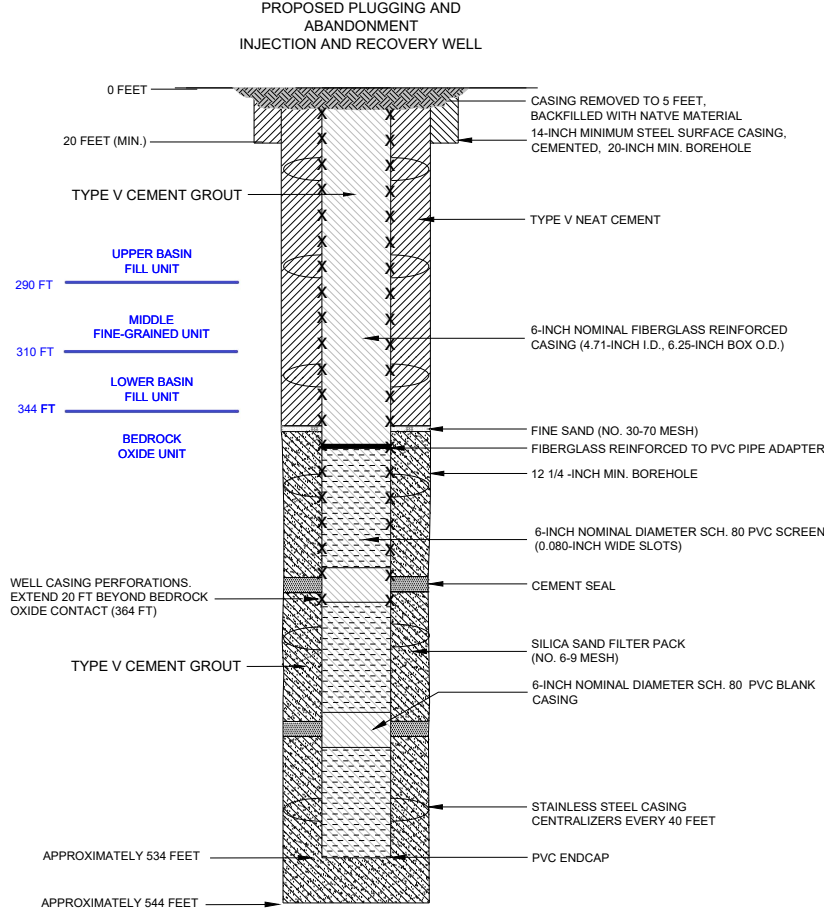
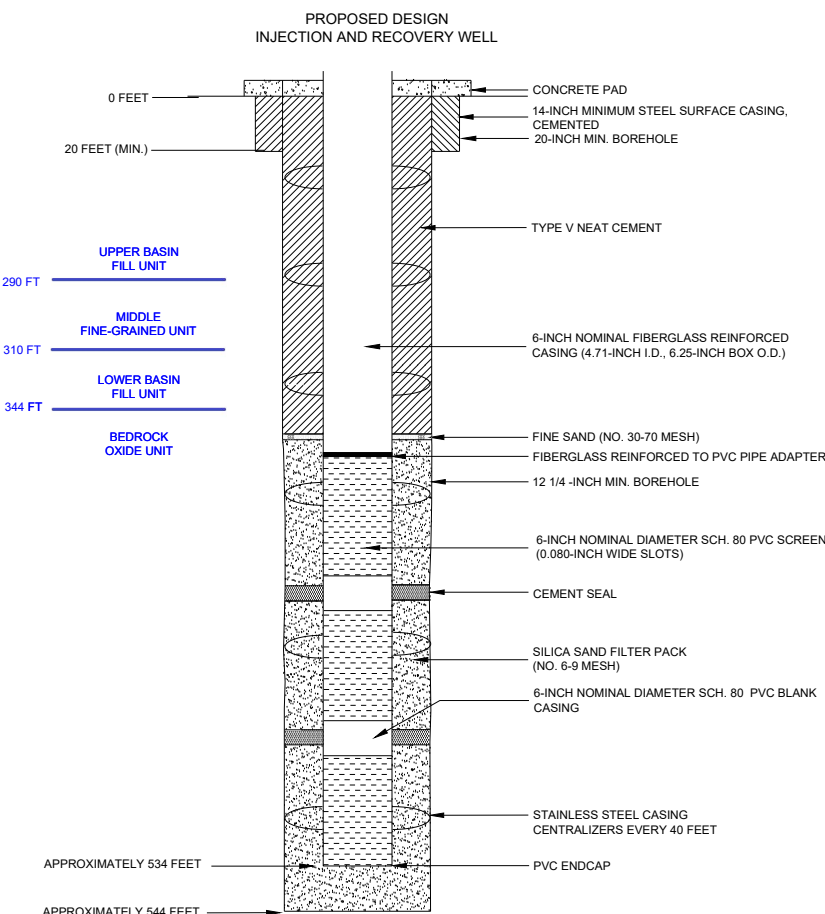
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

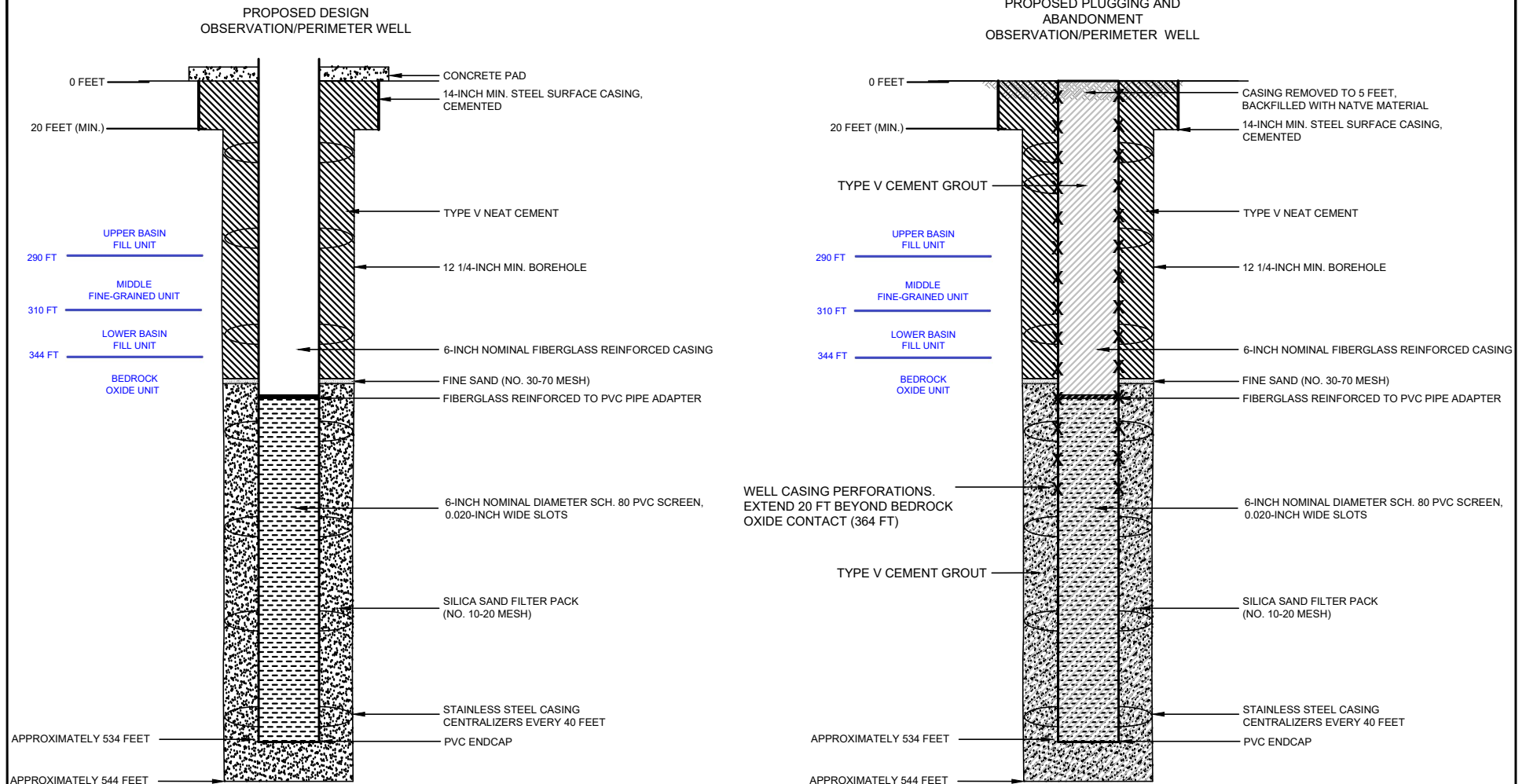


FLORENCE COPPER, INC.
FLORENCE, ARIZONA

**ABANDONMENT SCHEMATIC
RESOURCE BLOCK 30
TYPICAL INJECTION AND
RECOVERY WELL**

SCALE: AS SHOWN
JULY 2019

FIGURE E-8a



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

**HALEY
ALDRICH**

FLORENCE COPPER, INC.
 FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 30 OBSERVATION/PERIMETER WELL

JULY 2019
 SCALE: AS SHOWN

FIGURE E-8b

TABLE E-8
WELLS WITHIN RESOURCE BLOCK 30
 FLORENCE COPPER PROJECT
 FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
28	848967	747121	30	344	384	534
30	849109	747121	30	344	384	534
31	849038	747121	30	344	384	534
36	849321	747121	30	344	384	534
37	849180	747121	30	344	384	534
38	849250	747121	30	344	384	534
41	849109	746768	30	344	384	534
48	849038	746838	30	344	384	534
49	849109	746838	30	344	384	534
50	849038	746768	30	344	384	534
56	848967	746909	30	344	384	534
62	848897	746980	30	344	384	534
63	848967	746980	30	344	384	534
64	848897	746909	30	344	384	534
66	848897	747050	30	344	384	534
67	848826	746980	30	344	384	534
68	849109	747050	30	344	384	534
70	848967	747050	30	344	384	534
69	849038	747050	30	344	384	534
57	849038	746909	30	344	384	534
58	848967	746838	30	344	384	534
71	849109	746980	30	344	384	534
72	849038	746980	30	344	384	534
73	849109	746909	30	344	384	534
75	849180	746837	30	344	384	534
76	849250	746909	30	344	384	534
77	849180	746909	30	344	384	534
78	849392	747050	30	344	384	534
79	849321	747050	30	344	384	534
80	849250	747050	30	344	384	534
82	849321	746980	30	344	384	534
81	849180	747050	30	344	384	534
83	849250	746980	30	344	384	534
84	849180	746980	30	344	384	534
295	849250	746768	30	344	384	534
296	849321	746838	30	344	384	534
297	849392	746909	30	344	384	534
298	849462	746980	30	344	384	534
300	849180	746697	30	344	384	534

TABLE E-8
WELLS WITHIN RESOURCE BLOCK 30
 FLORENCE COPPER PROJECT
 FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
315	849392	746980	30	344	384	534
317	849250	746838	30	344	384	534
316	849321	746909	30	344	384	534
318	849180	746768	30	344	384	534
319	849109	746697	30	344	384	534
O06	849038	747263	30	344	384	534
P12	849109	747192	30	344	384	534
P13	849251	747192	30	344	384	534

Notes:

ft bgs = feet below ground surface

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 31 Wells - See Attached Table E-9

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.052432

Surface Location

NW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.428116

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 31. There are 20 Class III multi-use injection/ recovery wells, 3 dedicated Class III observation, and 3 Class III perimeter wells planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out. The dedicated perimeter observation well will have a design and depth similar to the injection and recovery wells, but will not have a segmented well screen.

The work performed includes plugging and abandonment of the Class III wells in resource block 31. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figures E-9a and E-9b.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

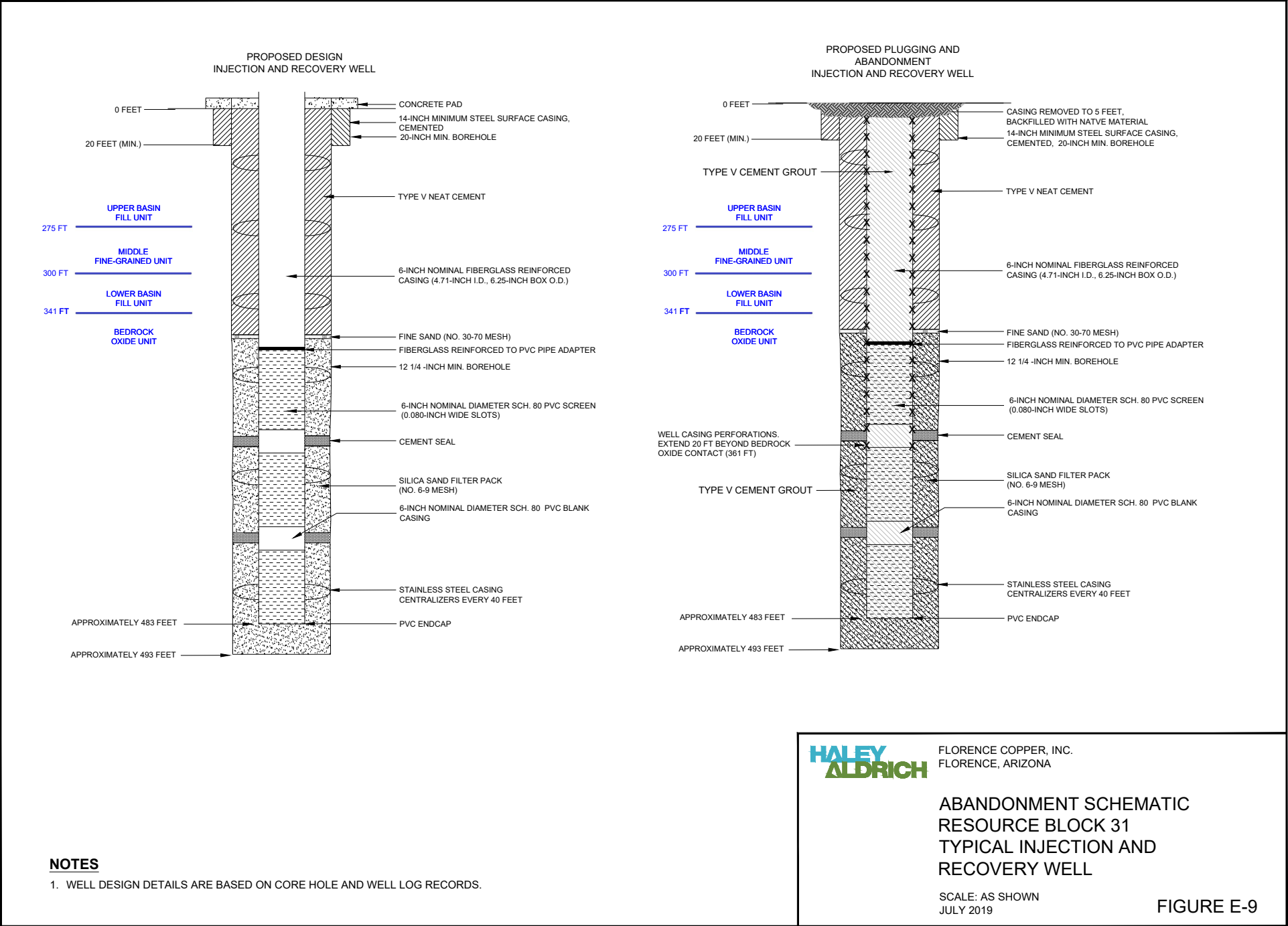
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

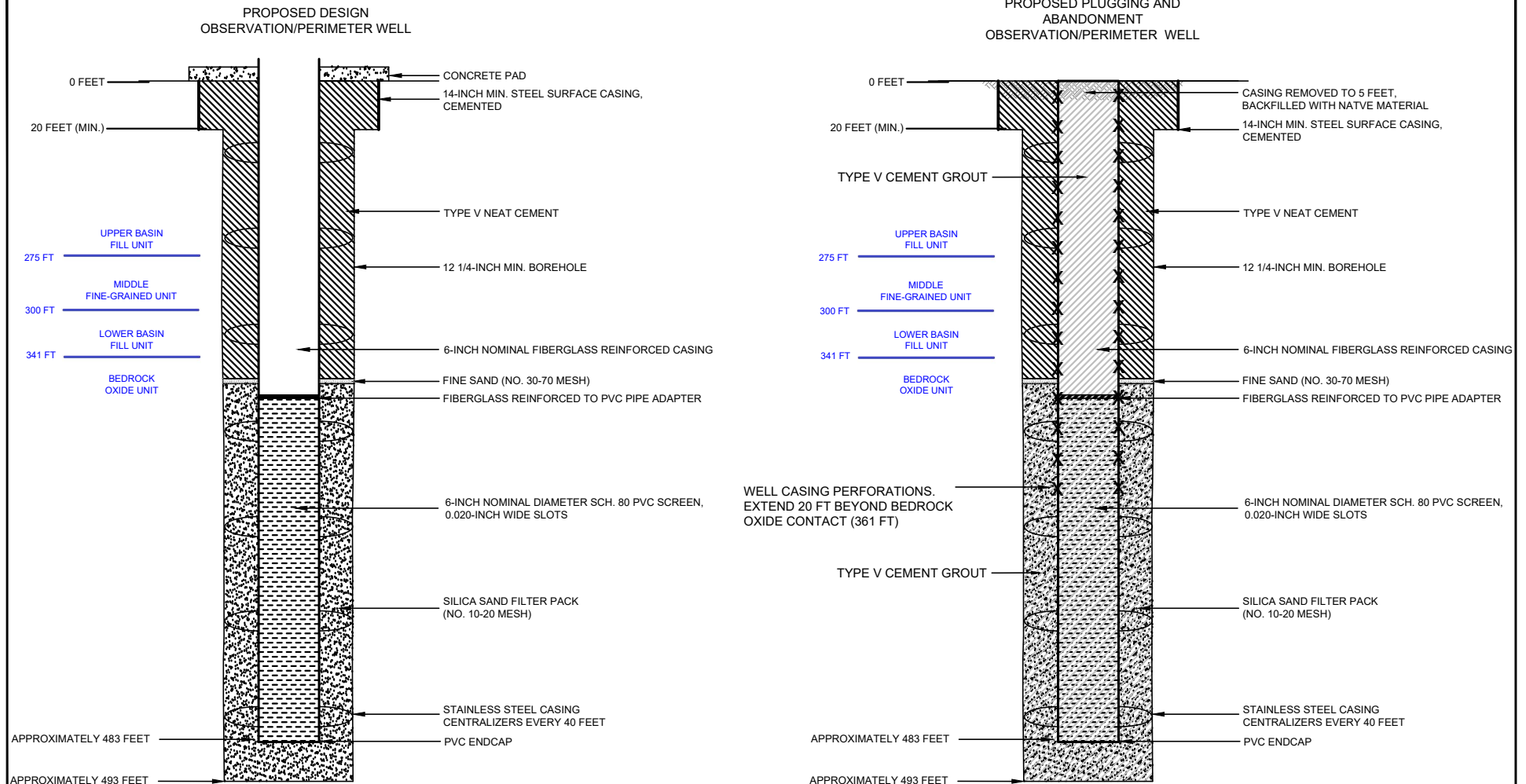
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.





NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 31 OBSERVATION/PERIMETER WELL

JULY 2019
SCALE: AS SHOWN

FIGURE E-9b

TABLE E-9
WELLS WITHIN RESOURCE BLOCK 31
 FLORENCE COPPER PROJECT
 FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
137	849674	747121	31	341	381	483
139	849816	747121	31	341	381	483
140	849745	747121	31	341	381	483
144	849816	746697	31	341	381	483
152	849745	746838	31	341	381	483
154	849745	746768	31	341	381	483
162	849674	746909	31	341	381	483
163	849745	746909	31	341	381	483
164	849674	746838	31	341	381	483
173	849604	746980	31	341	381	483
174	849674	746980	31	341	381	483
175	849604	746909	31	341	381	483
180	849604	747050	31	341	381	483
181	849533	746980	31	341	381	483
191	849745	747050	31	341	381	483
192	849674	747050	31	341	381	483
193	849816	746980	31	341	381	483
194	849745	746980	31	341	381	483
303	849887	746697	31	341	381	483
327	849887	747121	31	341	381	483
O09	849888	747263	31	341	381	483
O10	849957	747050	31	341	381	483
O11	849957	746838	31	341	381	483
P17	849817	747192	31	341	381	483
P18	849958	747192	31	341	381	483
P19	849887	746980	31	341	381	483
P20	849887	746768	31	341	381	483

Notes:

ft bgs = feet below ground surface

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 31 Wells - See Attached Table E-9

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.052432

Surface Location

NW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.428116

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 31. There are 20 Class III multi-use injection/ recovery wells, 3 dedicated Class III observation, and 3 Class III perimeter wells planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out. The dedicated perimeter observation well will have a design and depth similar to the injection and recovery wells, but will not have a segmented well screen.

The work performed includes plugging and abandonment of the Class III wells in resource block 31. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figures E-9a and E-9b.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

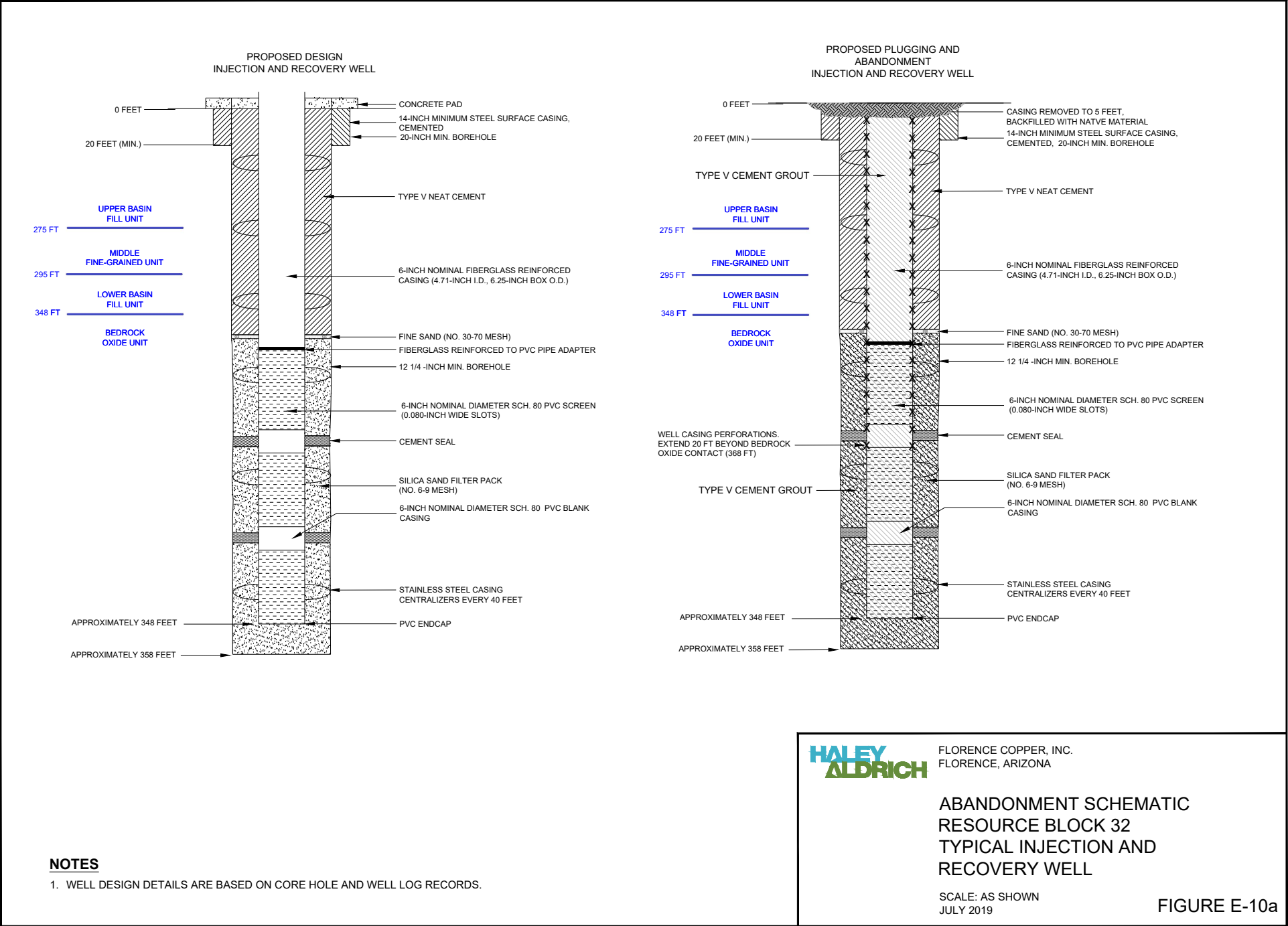
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

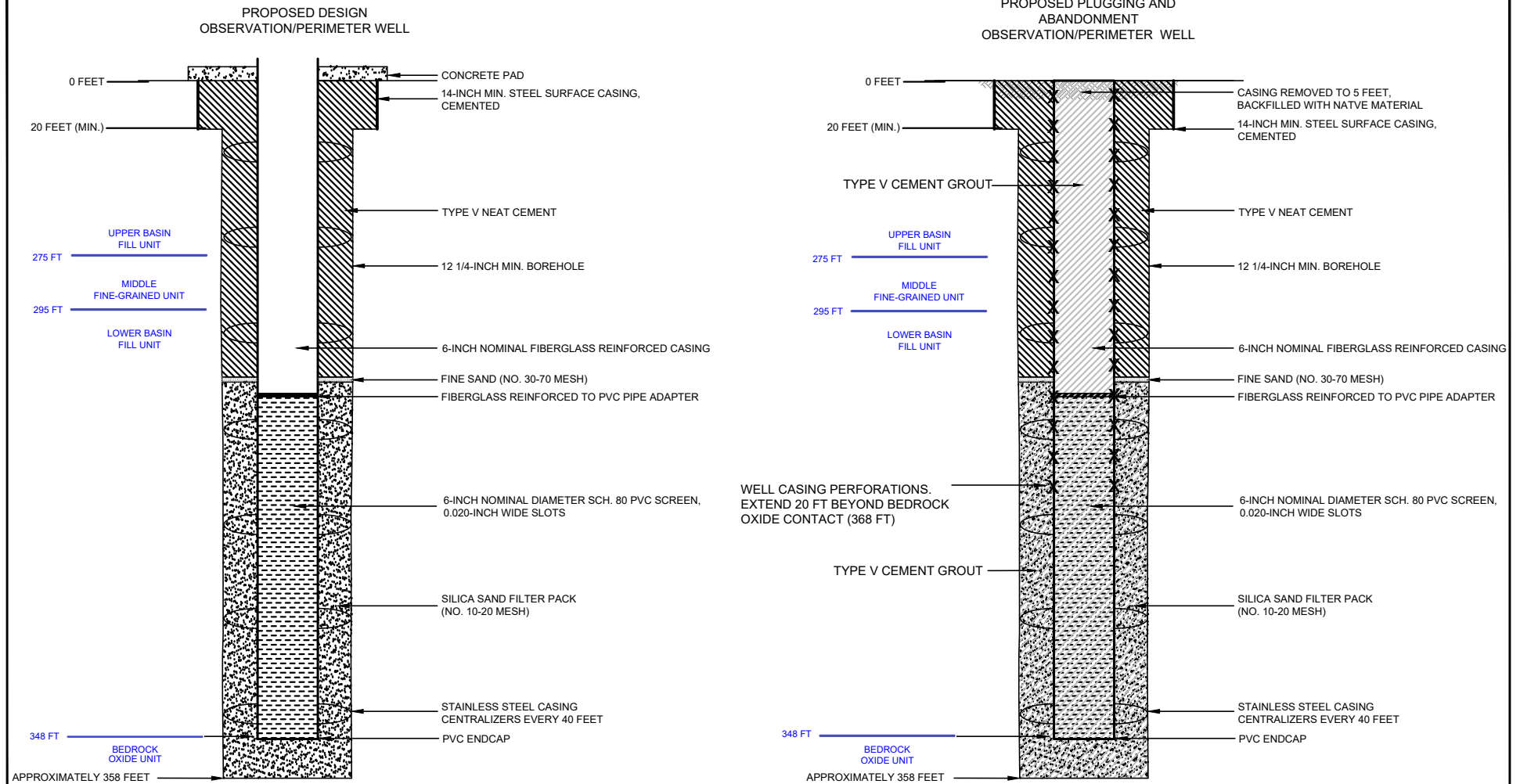
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.





NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.



FLORENCE COPPER, INC.
 FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 32 OBSERVATION/PERIMETER WELL

JULY 2019
 SCALE: AS SHOWN

FIGURE E-10b

TABLE E-10
WELLS WITHIN RESOURCE BLOCK 32
 FLORENCE COPPER PROJECT
 FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
326	850523	746697	32	348	388	491
O13	850523	746838	32	348	388	491
O14	850664	746626	32	348	388	491
P24	850452	746768	32	348	388	491
P25	850594	746768	32	348	388	491
P26	850594	746697	32	348	388	491

Notes:

ft bgs = feet below ground surface

Based on depths in block 40

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 36 Wells - See Attached Table E-11

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.051514

Surface Location

NW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.435765

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 36. There are 50 Class III multi-use injection/ recovery wells, planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out.

The work performed includes plugging and abandonment of the Class III wells in resource block 36. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figure E-11.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

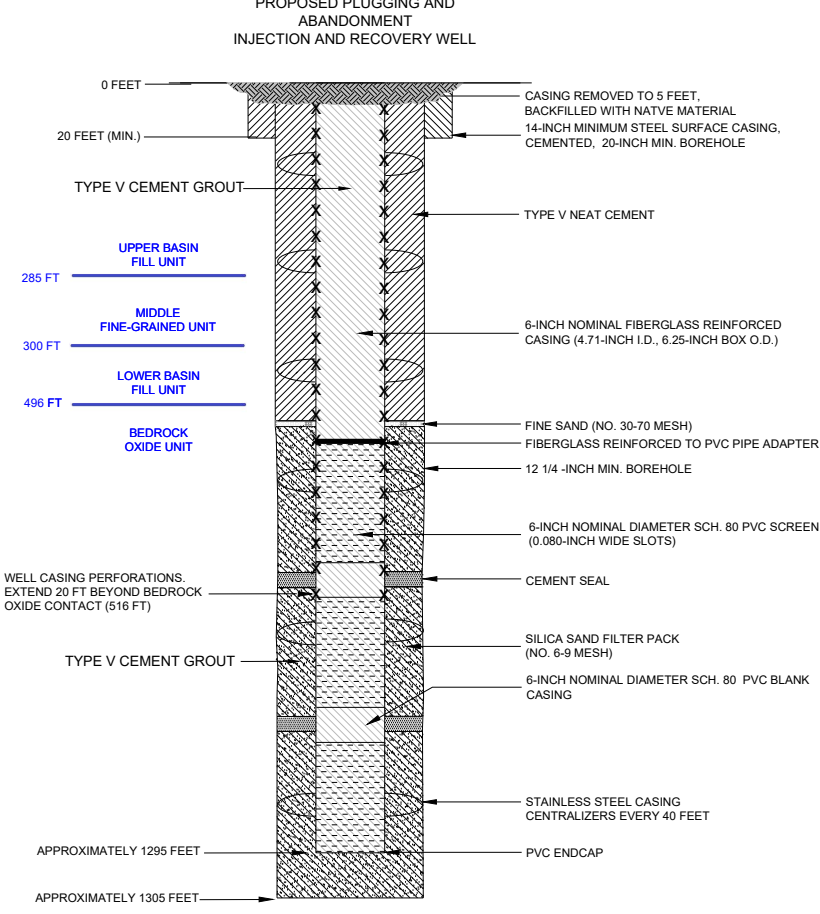
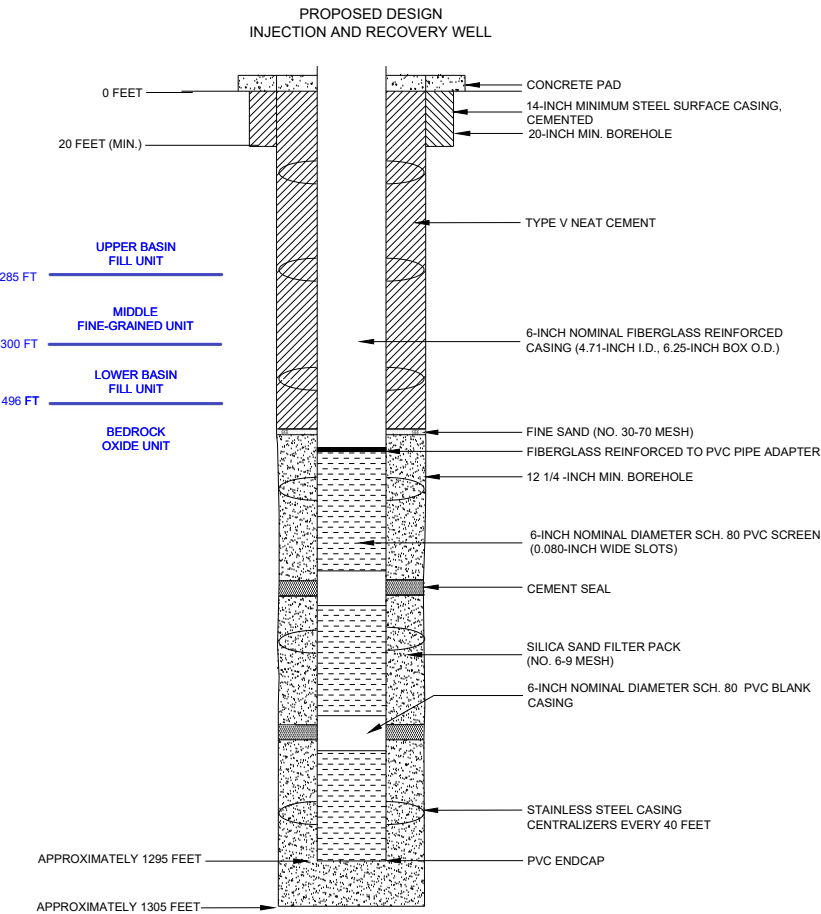
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

**ABANDONMENT SCHEMATIC
RESOURCE BLOCK 36
TYPICAL INJECTION AND
RECOVERY WELL**

SCALE: AS SHOWN
JULY 2019

FIGURE E-11

TABLE E-11

WELLS WITHIN RESOURCE BLOCK 36

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
514	847624	746556	36	496	536	1295
515	847624	746626	36	496	536	1295
516	847695	746626	36	496	536	1295
518	847553	746555	36	496	536	1295
520	847412	746343	36	496	536	1295
521	847412	746414	36	496	536	1295
522	847341	746343	36	496	536	1295
523	847553	746485	36	496	536	1295
524	847483	746485	36	496	536	1295
525	847483	746414	36	496	536	1295
572	847553	746697	36	496	536	1295
573	847553	746768	36	496	536	1295
574	847483	746838	36	496	536	1295
576	847483	746768	36	496	536	1295
577	847412	746909	36	496	536	1295
579	847412	746838	36	496	536	1295
582	847341	746909	36	496	536	1295
592	847624	746697	36	496	536	1295
715	847483	746697	36	496	536	1295
716	847412	746768	36	496	536	1295
717	847341	746838	36	496	536	1295
726	847412	746555	36	496	536	1295
727	847483	746626	36	496	536	1295
728	847412	746626	36	496	536	1295
729	847341	746555	36	496	536	1295
730	847200	746555	36	496	536	1295
731	847270	746626	36	496	536	1295
732	847341	746697	36	496	536	1295
733	847412	746697	36	496	536	1295
734	847341	746626	36	496	536	1295
735	847270	746555	36	496	536	1295
736	847129	746626	36	496	536	1295
737	847200	746697	36	496	536	1295
738	847270	746768	36	496	536	1295
774	847553	746626	36	496	536	1295
773	847412	746485	36	496	536	1295
765	847200	746485	36	496	536	1295
764	847270	746485	36	496	536	1295
756	847270	746414	36	496	536	1295

TABLE E-11
WELLS WITHIN RESOURCE BLOCK 36
 FLORENCE COPPER PROJECT
 FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
755	847341	746485	36	496	536	1295
754	847341	746414	36	496	536	1295
749	847483	746555	36	496	536	1295
746	847058	746626	36	496	536	1295
745	847129	746697	36	496	536	1295
744	847200	746768	36	496	536	1295
743	847270	746838	36	496	536	1295
742	847129	746555	36	496	536	1295
741	847200	746626	36	496	536	1295
740	847270	746697	36	496	536	1295
739	847341	746768	36	496	536	1295

Notes:

ft bgs = feet below ground surface

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 37 Wells - See Attached Table E-12

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.051518

Surface Location

NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.433408

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 37. There are 49 Class III multi-use injection/ recovery wells, planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out.

The work performed includes plugging and abandonment of the Class III wells in resource block 37. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figure E-12.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

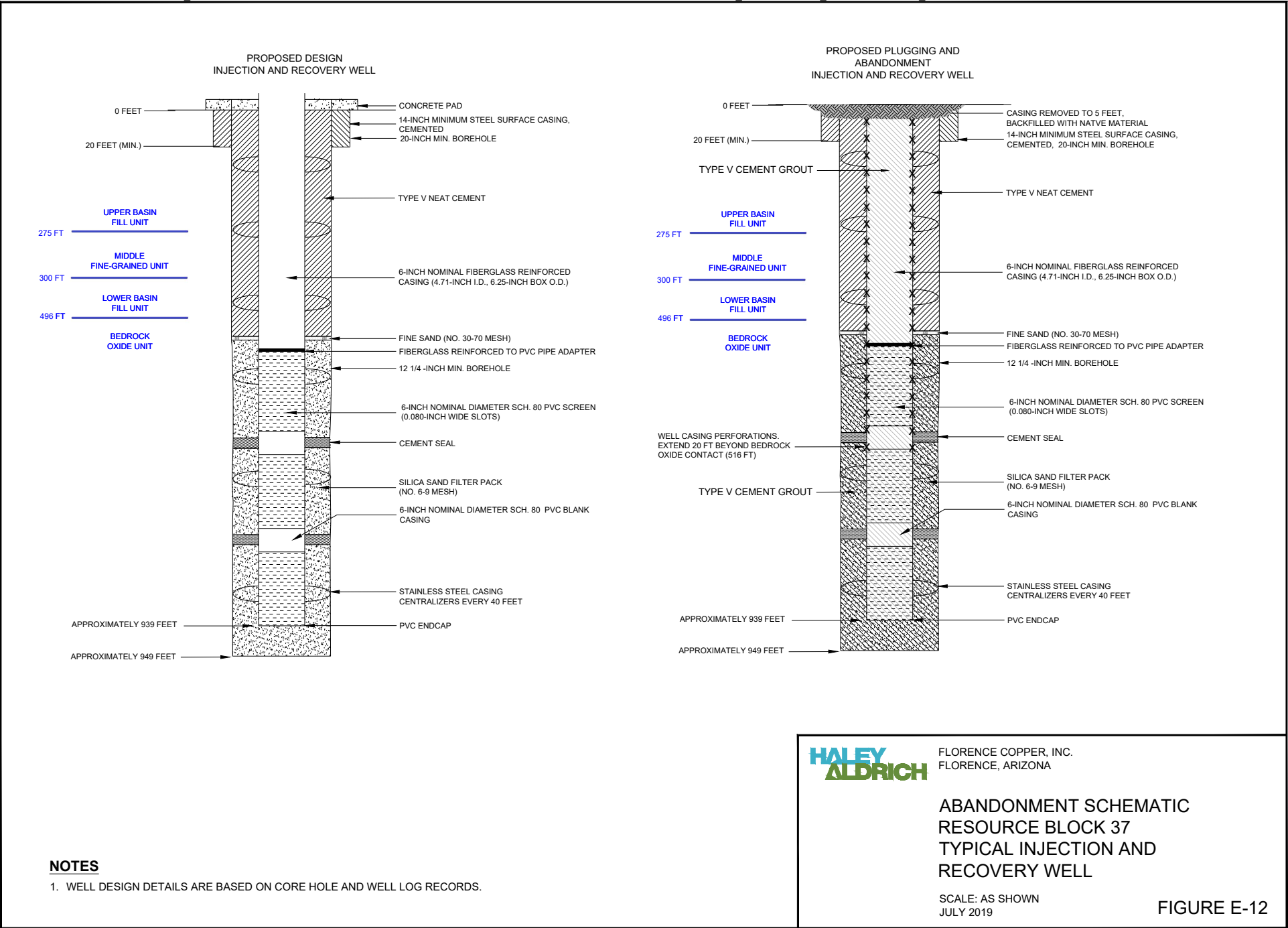


TABLE E-12

WELLS WITHIN RESOURCE BLOCK 37

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
333	848260	746556	37	496	536	939
334	848260	746485	37	496	536	939
335	848190	746485	37	496	536	939
336	848190	746414	37	496	536	939
337	848119	746343	37	496	536	939
338	848048	746343	37	496	536	939
339	848119	746414	37	496	536	939
538	847836	746555	37	496	536	939
540	847765	746626	37	496	536	939
561	847907	746485	37	496	536	939
563	847977	746414	37	496	536	939
636	847977	746697	37	496	536	939
637	847978	746768	37	496	536	939
638	847907	746697	37	496	536	939
639	847978	746838	37	496	536	939
640	847907	746768	37	496	536	939
641	847977	746626	37	496	536	939
642	848315	746556	37	496	536	939
644	848260	746626	37	496	536	939
645	848331	746697	37	496	536	939
648	848331	746626	37	496	536	939
649	848190	746697	37	496	536	939
650	848260	746768	37	496	536	939
658	848260	746697	37	496	536	939
659	848190	746626	37	496	536	939
664	848190	746768	37	496	536	939
665	848119	746697	37	496	536	939
666	848119	746768	37	496	536	939
667	848190	746838	37	496	536	939
673	848119	746838	37	496	536	939
674	848048	746768	37	496	536	939
675	848190	746556	37	496	536	939
676	848048	746556	37	496	536	939
677	848119	746556	37	496	536	939
678	848119	746626	37	496	536	939
679	848048	746626	37	496	536	939
680	848048	746697	37	496	536	939
681	848049	746837	37	496	536	939
682	848119	746909	37	496	536	939

TABLE E-12**WELLS WITHIN RESOURCE BLOCK 37**

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
683	848048	746909	37	496	536	939
690	848119	746485	37	496	536	939
691	847907	746626	37	496	536	939
692	847836	746626	37	496	536	939
693	847836	746697	37	496	536	939
694	847977	746555	37	496	536	939
695	847907	746555	37	496	536	939
696	847977	746485	37	496	536	939
697	848048	746485	37	496	536	939
698	848048	746414	37	496	536	939

Notes:*ft bgs = feet below ground surface*

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 38 Wells - See Attached Table E-13

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.051569

Surface Location

NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.431269

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 38. There are 53 Class III multi-use injection/ recovery wells, planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out.

The work performed includes plugging and abandonment of the Class III wells in resource block 38. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figure E-13.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

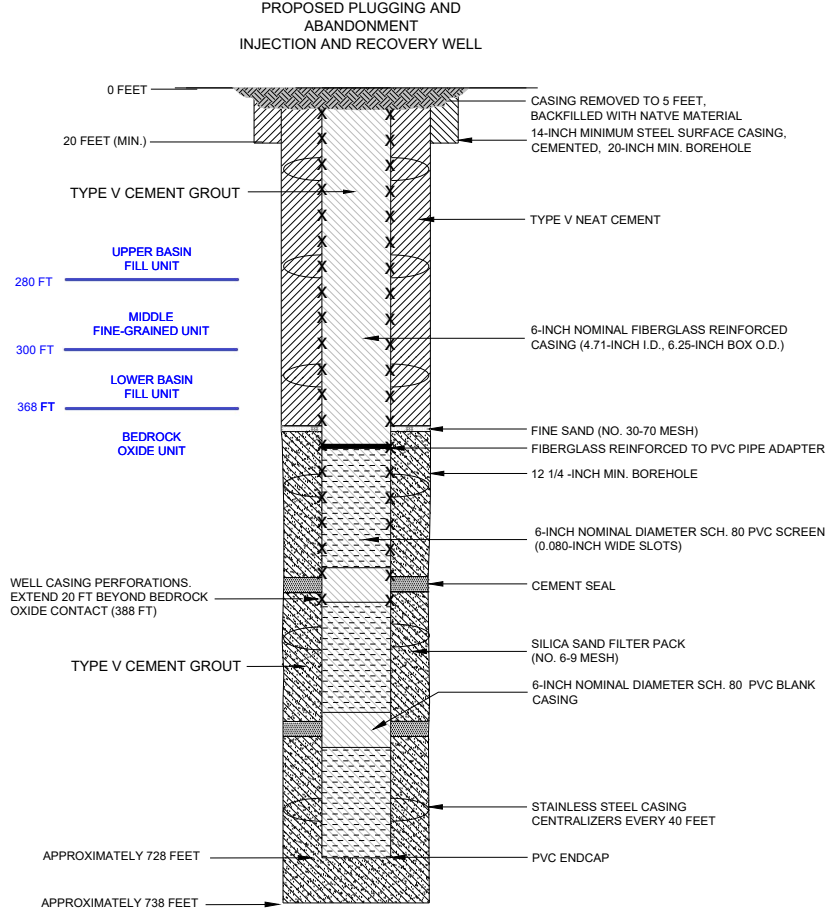
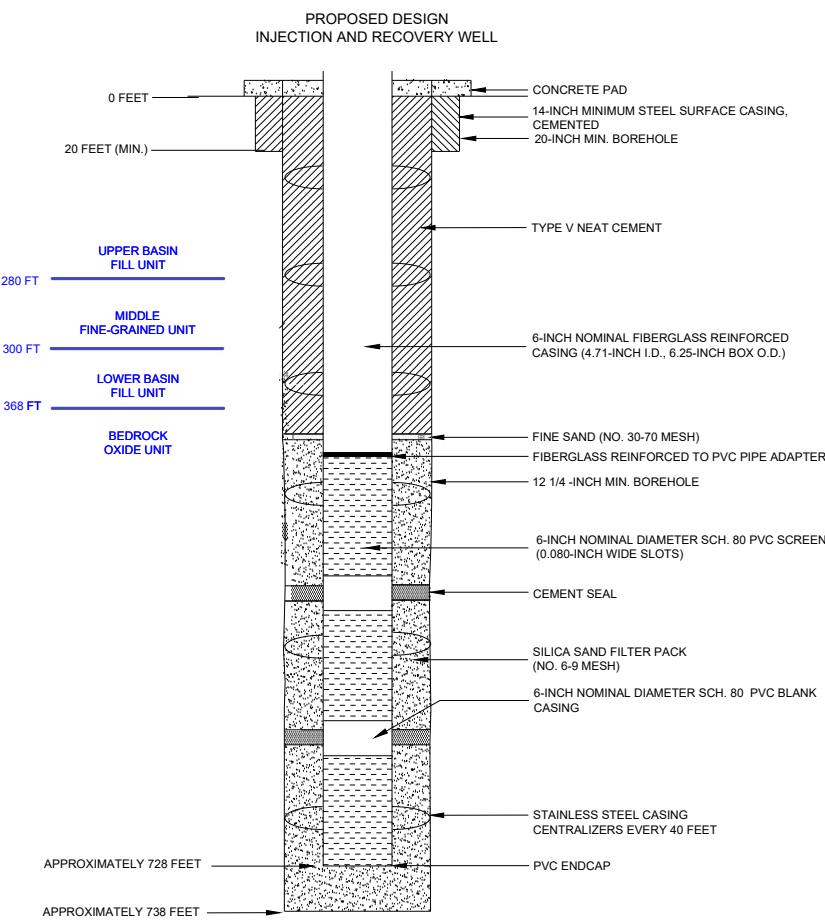
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

**ABANDONMENT SCHEMATIC
RESOURCE BLOCK 38
TYPICAL INJECTION AND
RECOVERY WELL**

SCALE: AS SHOWN
JULY 2019

FIGURE E-13

TABLE E-13

WELLS WITHIN RESOURCE BLOCK 38

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
12	848614	746626	38	368	408	728
13	848685	746697	38	368	408	728
14	848685	746768	38	368	408	728
15	848614	746697	38	368	408	728
16	848685	746838	38	368	408	728
17	848614	746768	38	368	408	728
18	848543	746697	38	368	408	728
19	848685	746556	38	368	408	728
20	848685	746626	38	368	408	728
21	848755	746768	38	368	408	728
22	848755	746556	38	368	408	728
23	848755	746626	38	368	408	728
24	848755	746697	38	368	408	728
25	848756	746838	38	368	408	728
26	848755	746909	38	368	408	728
27	848755	746485	38	368	408	728
32	849462	747121	38	368	408	728
34	849392	747121	38	368	408	728
40	848967	746555	38	368	408	728
42	849038	746697	38	368	408	728
43	848967	746626	38	368	408	728
44	848897	746555	38	368	408	728
45	848826	746626	38	368	408	728
46	848897	746697	38	368	408	728
47	848967	746768	38	368	408	728
51	848967	746697	38	368	408	728
52	848897	746626	38	368	408	728
53	848826	746555	38	368	408	728
54	848826	746768	38	368	408	728
55	848897	746838	38	368	408	728
59	848897	746768	38	368	408	728
60	848826	746697	38	368	408	728
61	848826	746909	38	368	408	728
65	848826	746838	38	368	408	728
74	849038	746555	38	368	408	728
85	848826	746343	38	368	408	728
86	848897	746414	38	368	408	728
87	848897	746485	38	368	408	728
88	848826	746414	38	368	408	728

TABLE E-13

WELLS WITHIN RESOURCE BLOCK 38

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
89	848826	746485	38	368	408	728
90	848967	746485	38	368	408	728
91	848755	746343	38	368	408	728
299	849109	746626	38	368	408	728
312	849038	746626	38	368	408	728
340	848614	746556	38	368	408	728
341	848685	746485	38	368	408	728
342	848755	746414	38	368	408	728
343	848543	746556	38	368	408	728
385	848614	746485	38	368	408	728
387	848685	746414	38	368	408	728
700	848543	746626	38	368	408	728
701	848495	746556	38	368	408	728
702	848504	746626	38	368	408	728

Notes:*ft bgs = feet below ground surface*

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 39 Wells - See Attached Table E-14

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.051457

Surface Location

NW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.428830

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 39. There are 51 Class III multi-use injection/ recovery wells, planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out.

The work performed includes plugging and abandonment of the Class III wells in resource block 39. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figure E-14.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

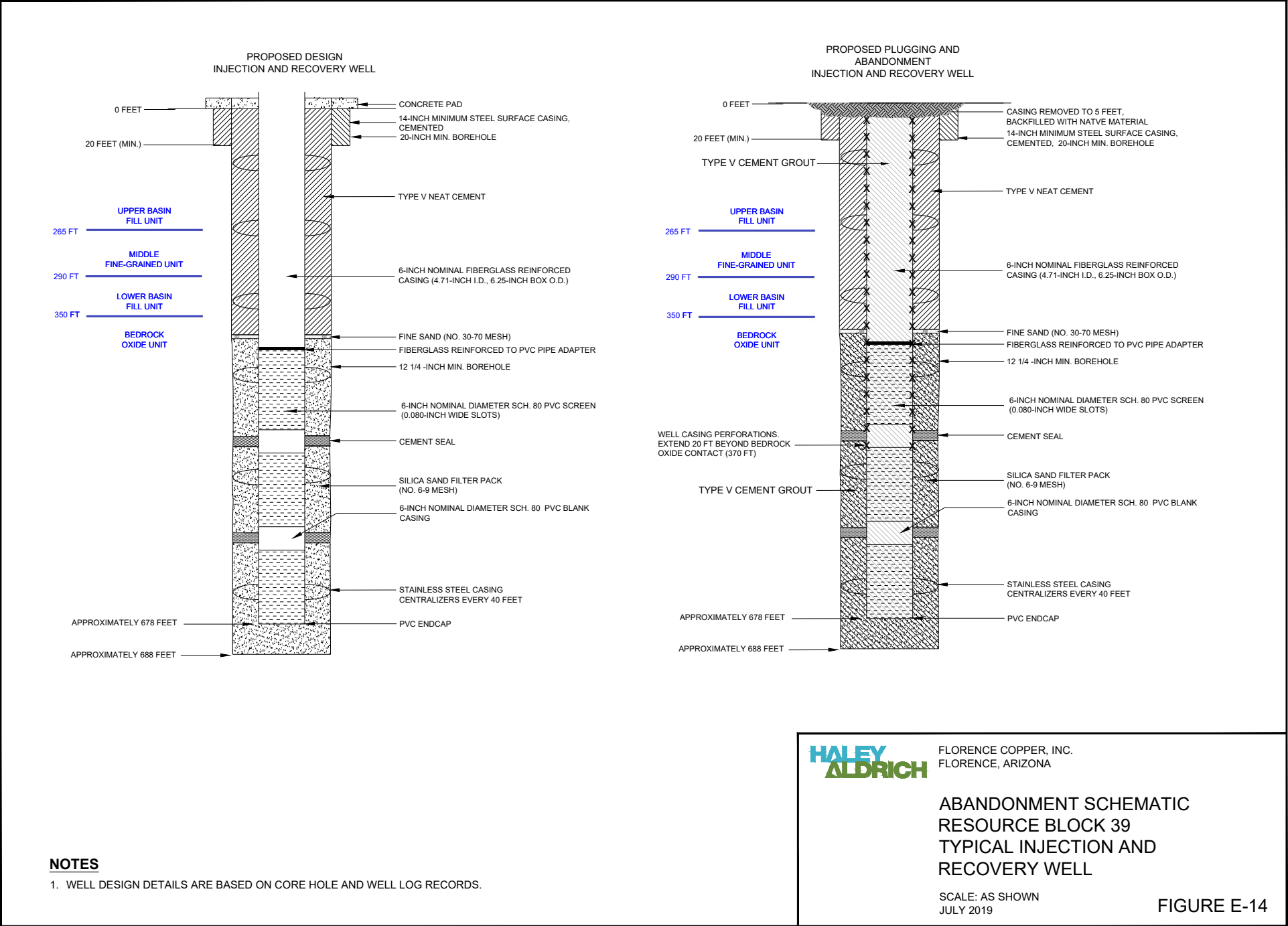


TABLE E-14

WELLS WITHIN RESOURCE BLOCK 39

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
142	849674	746556	39	350	390	678
143	849745	746626	39	350	390	678
145	849745	746697	39	350	390	678
146	849674	746626	39	350	390	678
147	849604	746556	39	350	390	678
148	849462	746556	39	350	390	678
149	849533	746626	39	350	390	678
150	849604	746697	39	350	390	678
151	849674	746768	39	350	390	678
155	849674	746697	39	350	390	678
156	849604	746626	39	350	390	678
157	849533	746556	39	350	390	678
158	849392	746626	39	350	390	678
159	849462	746697	39	350	390	678
160	849533	746768	39	350	390	678
161	849604	746838	39	350	390	678
165	849604	746768	39	350	390	678
166	849533	746697	39	350	390	678
167	849462	746626	39	350	390	678
168	849392	746556	39	350	390	678
169	849321	746697	39	350	390	678
170	849392	746768	39	350	390	678
171	849462	746838	39	350	390	678
172	849533	746909	39	350	390	678
176	849533	746838	39	350	390	678
177	849462	746768	39	350	390	678
178	849392	746697	39	350	390	678
179	849321	746626	39	350	390	678
182	849462	746909	39	350	390	678
183	849392	746838	39	350	390	678
184	849321	746768	39	350	390	678
185	849250	746697	39	350	390	678
186	849334	746556	39	350	390	678
188	849250	746556	39	350	390	678
189	849250	746626	39	350	390	678
190	849179	746626	39	350	390	678
195	849745	746556	39	350	390	678
196	849816	746626	39	350	390	678
199	849533	746343	39	350	390	678

TABLE E-14

WELLS WITHIN RESOURCE BLOCK 39

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
200	849604	746405	39	350	390	678
201	849604	746485	39	350	390	678
202	849533	746405	39	350	390	678
203	849462	746343	39	350	390	678
207	849462	746405	39	350	390	678
208	849533	746485	39	350	390	678
209	849462	746485	39	350	390	678
210	849392	746414	39	350	390	678
212	849392	746485	39	350	390	678
213	849321	746485	39	350	390	678
216	849321	746446	39	350	390	678
218	849674	746485	39	350	390	678

Notes:*ft bgs = feet below ground surface*

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 40 Wells - See Attached Table E-15

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.051341

Surface Location

NW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.426663

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 40. There are 38 Class III multi-use injection/ recovery wells, 1 dedicated Class III observation, and 3 Class III perimeter wells planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out. The dedicated perimeter observation well will have a design and depth similar to the injection and recovery wells, but will not have a segmented well screen.

The work performed includes plugging and abandonment of the Class III wells in resource block 40. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figures E-15a and E-15b.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

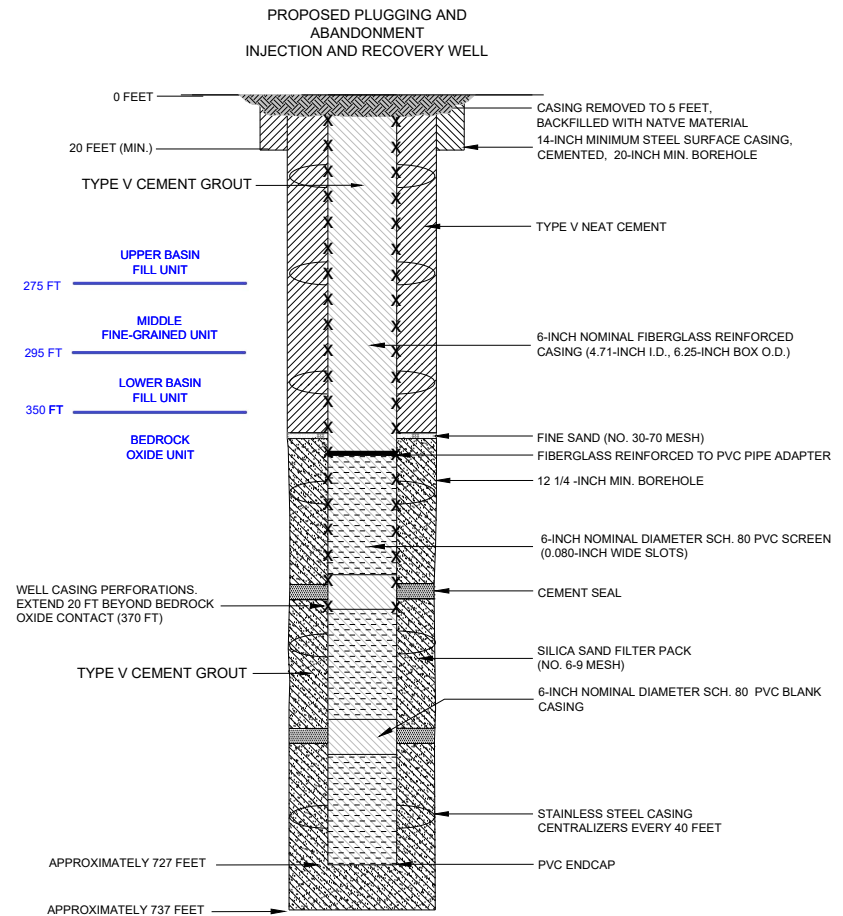
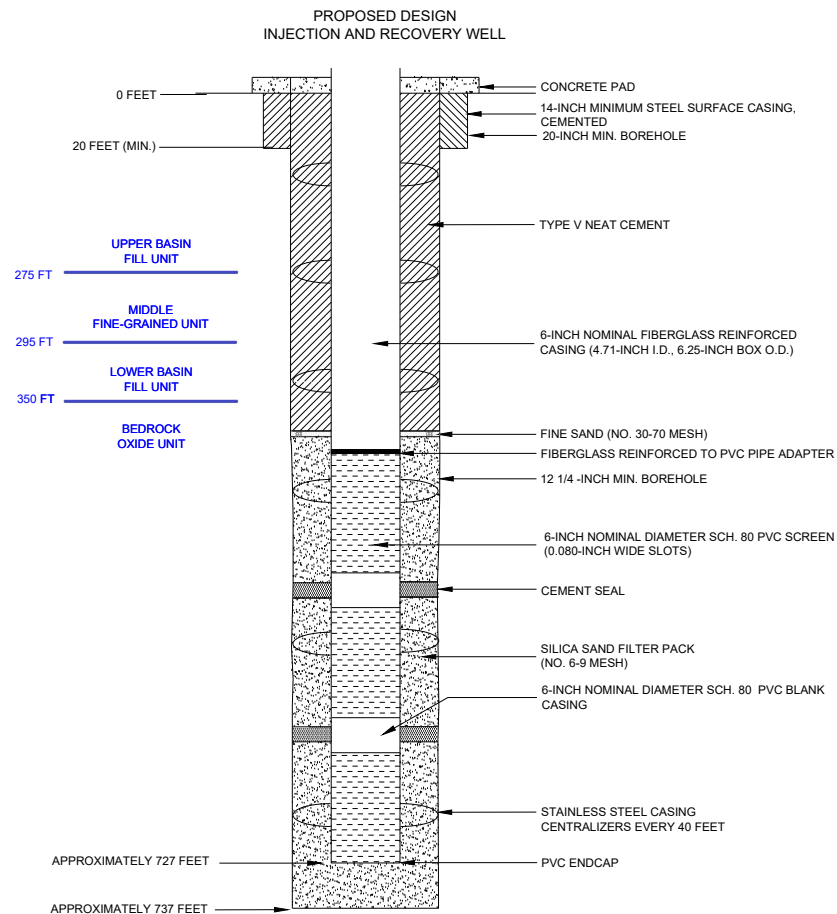
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

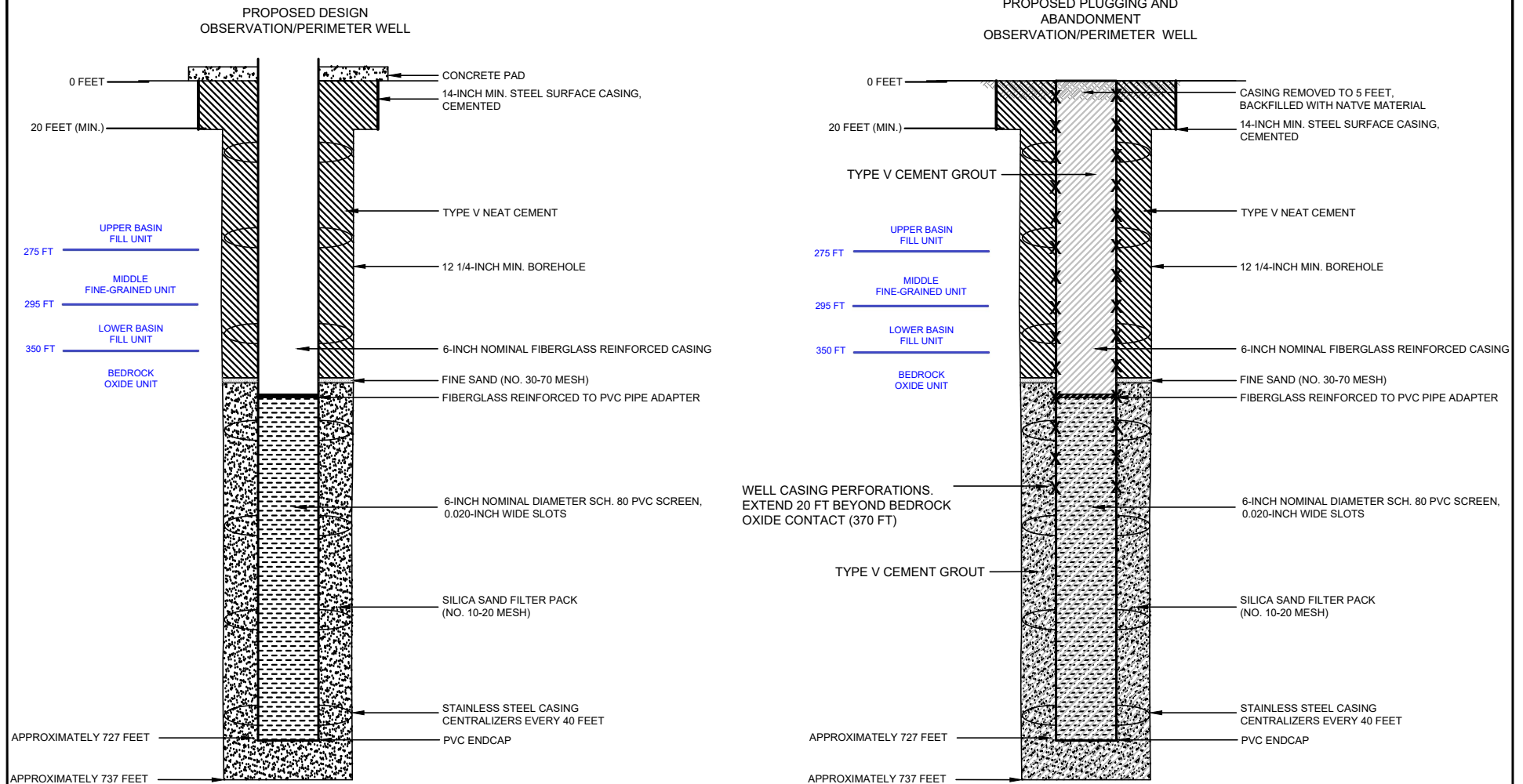
HALEY
ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC
RESOURCE BLOCK 40
TYPICAL INJECTION AND
RECOVERY WELL

SCALE: AS SHOWN
JULY 2019

FIGURE E-15a



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

**HALEY
ALDRICH**

FLORENCE COPPER, INC.
 FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 40 OBSERVATION/PERIMETER WELL

JULY 2019
 SCALE: AS SHOWN

FIGURE E-15b

TABLE E-15

WELLS WITHIN RESOURCE BLOCK 40

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
221	849887	746626	40	350	390	727
245	850099	746556	40	350	390	727
246	850169	746626	40	350	390	727
325	850452	746697	40	350	390	727
324	850523	746626	40	350	390	727
247	850240	746697	40	350	390	727
248	850099	746626	40	350	390	727
249	850028	746556	40	350	390	727
250	849957	746626	40	350	390	727
251	850099	746697	40	350	390	727
252	850028	746626	40	350	390	727
253	849957	746556	40	350	390	727
254	849957	746697	40	350	390	727
255	850240	746556	40	350	390	727
256	850169	746556	40	350	390	727
257	850240	746626	40	350	390	727
259	850452	746626	40	350	390	727
260	850382	746697	40	350	390	727
261	850452	746556	40	350	390	727
262	850311	746556	40	350	390	727
263	850381	746556	40	350	390	727
264	850382	746626	40	350	390	727
265	850311	746626	40	350	390	727
268	850169	746343	40	350	390	727
272	850099	746414	40	350	390	727
275	850028	746485	40	350	390	727
278	850240	746485	40	350	390	727
279	850169	746485	40	350	390	727
280	850099	746485	40	350	390	727
281	850240	746414	40	350	390	727
282	850169	746414	40	350	390	727
283	850240	746343	40	350	390	727
290	850381	746485	40	350	390	727
291	850311	746485	40	350	390	727
294	850311	746414	40	350	390	727

TABLE E-15**WELLS WITHIN RESOURCE BLOCK 40**

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
304	850028	746697	40	350	390	727
305	850169	746697	40	350	390	727
306	850311	746697	40	350	390	727
O12	850240	746838	40	350	390	727
P21	850028	746768	40	350	390	727
P22	850169	746768	40	350	390	727
P23	850311	746768	40	350	390	727

Notes:*ft bgs = feet below ground surface*

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 44 Wells - See Attached Table E-16

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.050516

Surface Location

NW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.436522

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 44. There are 31 Class III multi-use injection/ recovery wells, 3 dedicated Class III observation, and 5 Class III perimeter wells planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out. The dedicated perimeter observation well will have a design and depth similar to the injection and recovery wells, but will not have a segmented well screen.

The work performed includes plugging and abandonment of the Class III wells in resource block 44. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figures E-16a and E-16b.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

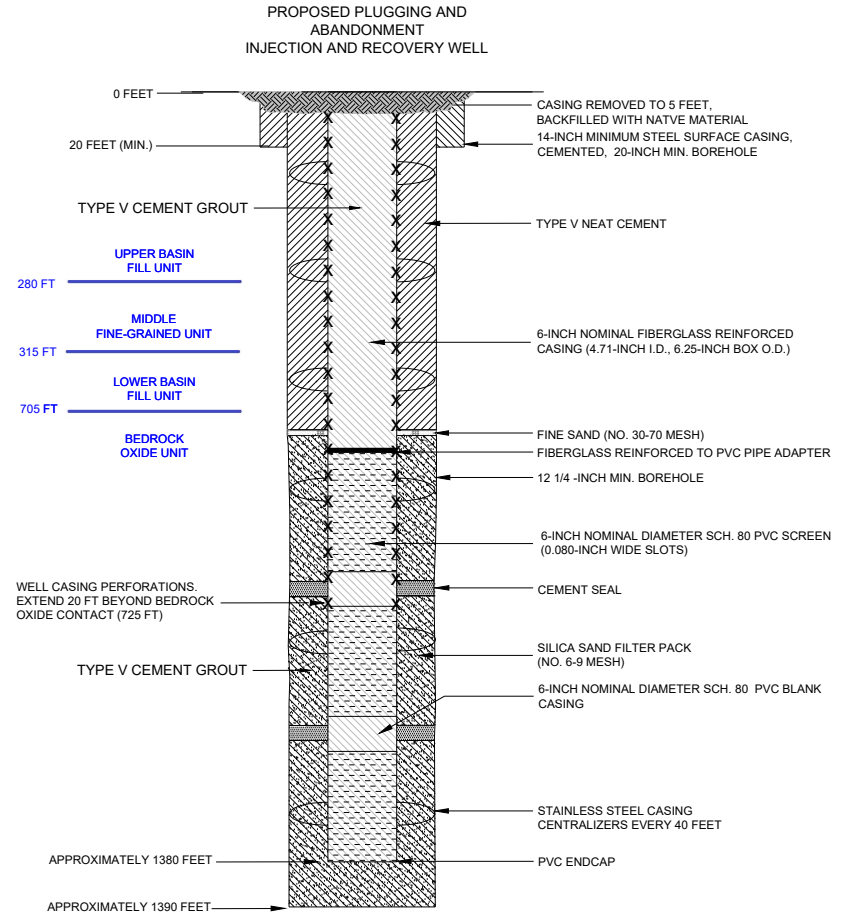
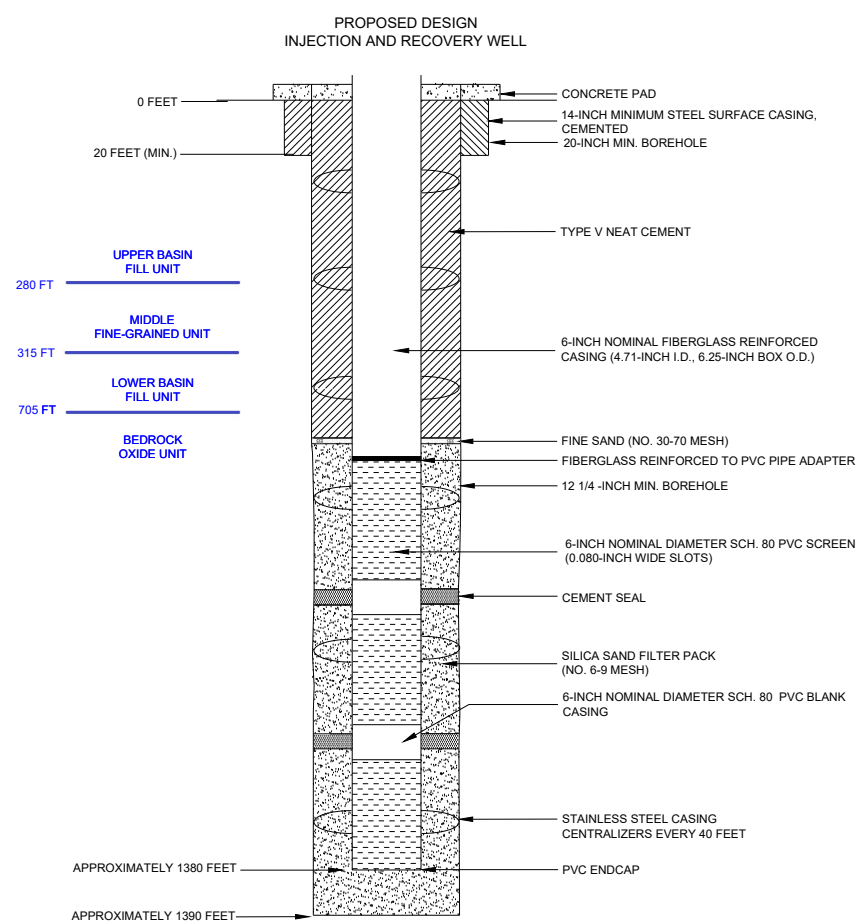
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

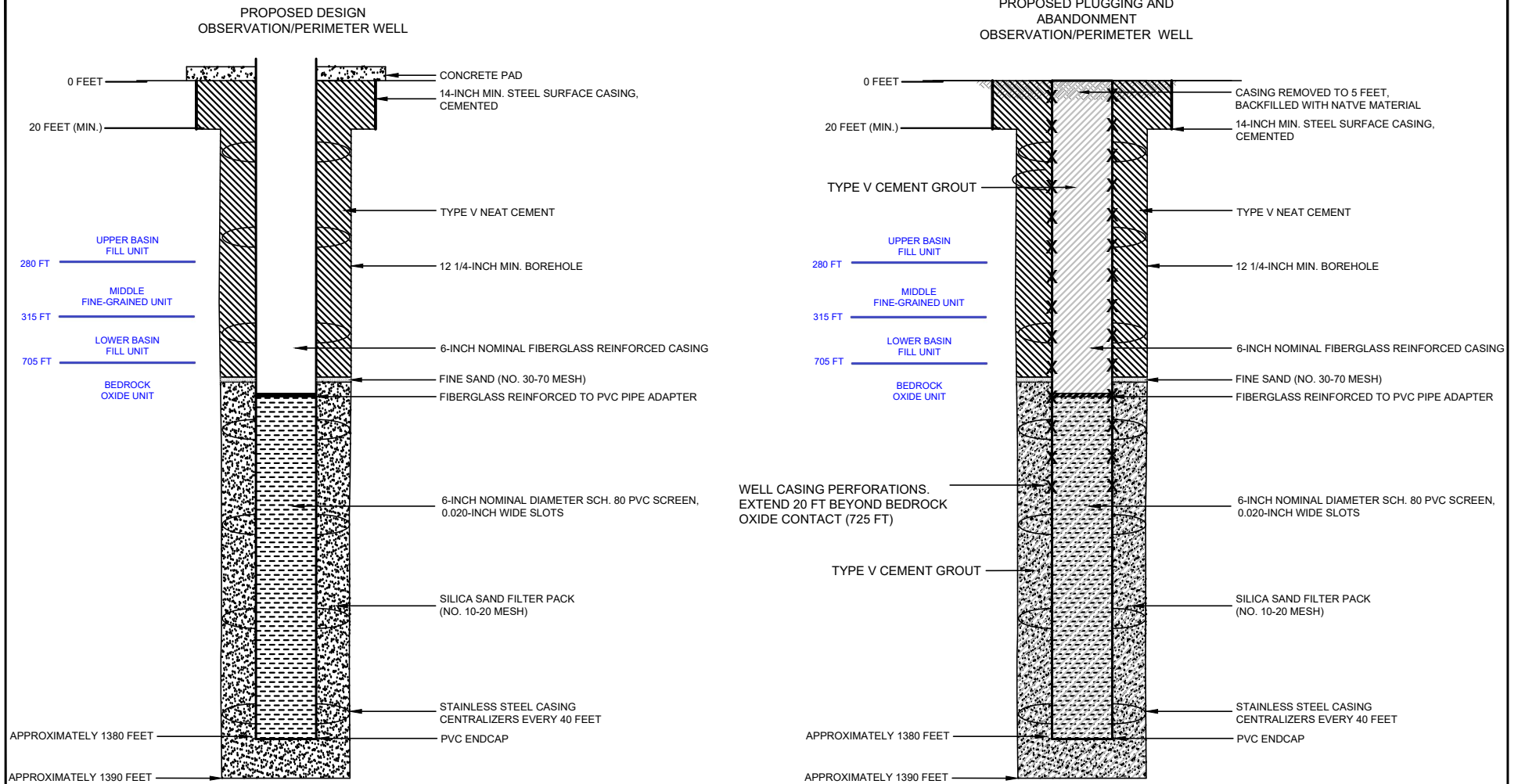


FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 44 TYPICAL INJECTION AND RECOVERY WELL

SCALE: AS SHOWN
JULY 2019

FIGURE E-16a



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 44 OBSERVATION/PERIMETER WELL

JULY 2019
SCALE: AS SHOWN

FIGURE E-16b

TABLE E-16
WELLS WITHIN RESOURCE BLOCK 44
 FLORENCE COPPER PROJECT
 FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
472	847129	746060	44	705	745	1380
473	847200	746131	44	705	745	1380
474	847270	746202	44	705	745	1380
475	847270	746273	44	705	745	1380
476	847200	746202	44	705	745	1380
477	847129	746131	44	705	745	1380
479	847058	745990	44	705	745	1380
480	846988	745990	44	705	745	1380
478	847058	746060	44	705	745	1380
519	847341	746273	44	705	745	1380
747	847058	746555	44	705	745	1380
750	847058	746131	44	705	745	1380
751	847129	746202	44	705	745	1380
752	847200	746273	44	705	745	1380
753	847270	746343	44	705	745	1380
757	847200	746343	44	705	745	1380
758	847129	746273	44	705	745	1380
759	847058	746202	44	705	745	1380
760	846988	746131	44	705	745	1380
761	847058	746273	44	705	745	1380
762	847129	746343	44	705	745	1380
763	847200	746414	44	705	745	1380
766	847129	746414	44	705	745	1380
767	847058	746343	44	705	745	1380
768	846988	746273	44	705	745	1380
769	847129	746485	44	705	745	1380
770	847058	746485	44	705	745	1380
771	847058	746414	44	705	745	1380
895	846988	746202	44	705	745	1380
898	846988	746060	44	705	745	1380
902	846988	746343	44	705	745	1380
O40	846846	746060	44	705	745	1380
O41	846846	746343	44	705	745	1380
O42	846917	746626	44	705	745	1380
P78	846917	745990	44	705	745	1380
P79	846917	746131	44	705	745	1380
P80	846917	746273	44	705	745	1380
P81	846988	746414	44	705	745	1380
P82	846988	746555	44	705	745	1380

Notes:

ft bgs = feet below ground surface

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 45 Wells - See Attached Table E-17

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.050597

Surface Location

NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.434617

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 45. There are 50 Class III multi-use injection/ recovery wells, planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out.

The work performed includes plugging and abandonment of the Class III wells in resource block 45. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figure E-17.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

TABLE E-17

WELLS WITHIN RESOURCE BLOCK 45

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
420 (PTF)	847624	746061	45	465	505	1200
421	847977	746202	45	465	505	1200
422	847907	746131	45	465	505	1200
423 (PTF)	847836	746061	45	465	505	1200
424	847765	745990	45	465	505	1200
425	847977	746273	45	465	505	1200
426	847907	746202	45	465	505	1200
427 (PTF)	847836	746131	45	465	505	1200
428 (PTF)	847765	746061	45	465	505	1200
429 (PTF)	847695	745990	45	465	505	1200
467	848048	746273	45	465	505	1200
481 (PTF)	847553	746131	45	465	505	1200
484	847483	746202	45	465	505	1200
485	847412	746273	45	465	505	1200
526 (PTF)	847553	746202	45	465	505	1200
527	847483	746273	45	465	505	1200
528	847553	746273	45	465	505	1200
529	847483	746343	45	465	505	1200
530	847553	746414	45	465	505	1200
531	847553	746343	45	465	505	1200
532 (PTF)	847624	746202	45	465	505	1200
533 (PTF)	847624	746131	45	465	505	1200
534 (PTF)	847625	746272	45	465	505	1200
535	847624	746343	45	465	505	1200
536	847624	746485	45	465	505	1200
537	847624	746414	45	465	505	1200
539	847765	746555	45	465	505	1200
541	847695	746555	45	465	505	1200
542 (PTF)	847695	746061	45	465	505	1200
543 (PTF)	847765	746131	45	465	505	1200
544 (PTF)	847836	746202	45	465	505	1200
545	847907	746273	45	465	505	1200
546 (PTF)	847695	746202	45	465	505	1200
547 (PTF)	847765	746273	45	465	505	1200
548	847836	746343	45	465	505	1200
549	847907	746343	45	465	505	1200
550	847836	746273	45	465	505	1200
551 (PTF)	847765	746202	45	465	505	1200
552 (PTF)	847695	746131	45	465	505	1200

TABLE E-17

WELLS WITHIN RESOURCE BLOCK 45

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
553	847695	746343	45	465	505	1200
554	847765	746414	45	465	505	1200
555	847836	746414	45	465	505	1200
556	847765	746343	45	465	505	1200
557 (PTF)	847695	746273	45	465	505	1200
558	847765	746485	45	465	505	1200
559	847695	746414	45	465	505	1200
560	847695	746485	45	465	505	1200
562	847836	746485	45	465	505	1200
564	847907	746414	45	465	505	1200
565	847977	746343	45	465	505	1200

Notes:*ft bgs = feet below ground surface*

(PTF) Denotes existing PTF ISCR well

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 46 Wells - See Attached Table E-18

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.050571

Surface Location

NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.432280

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 46. There are 49 Class III multi-use injection/ recovery wells, planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out.

The work performed includes plugging and abandonment of the Class III wells in resource block 46. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figure E-18.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

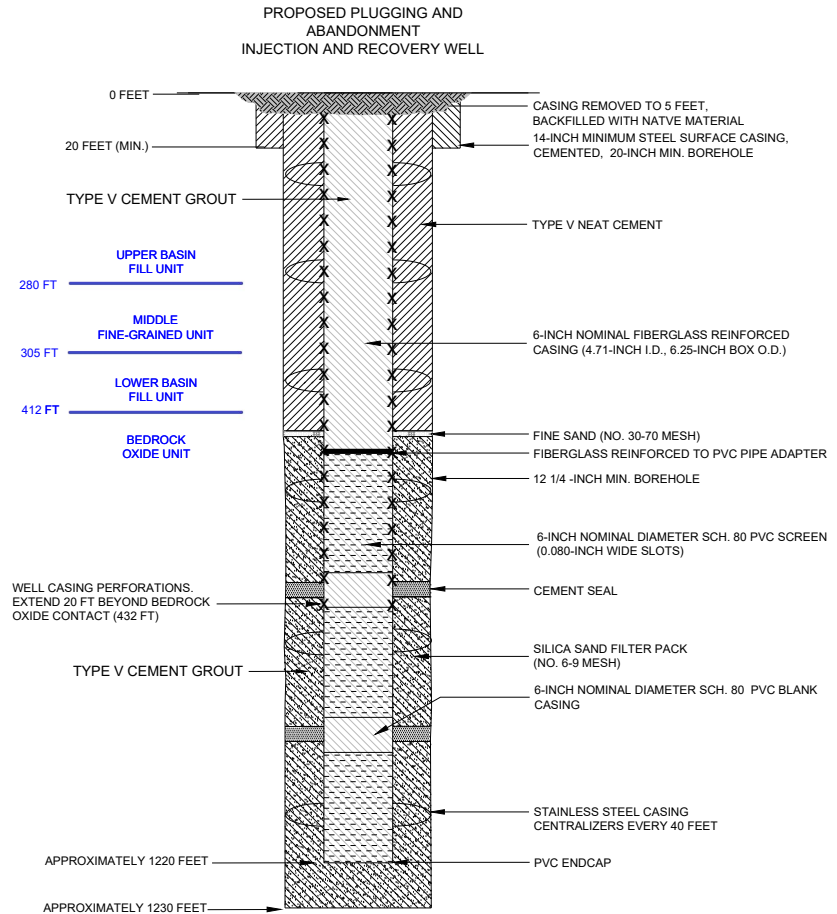
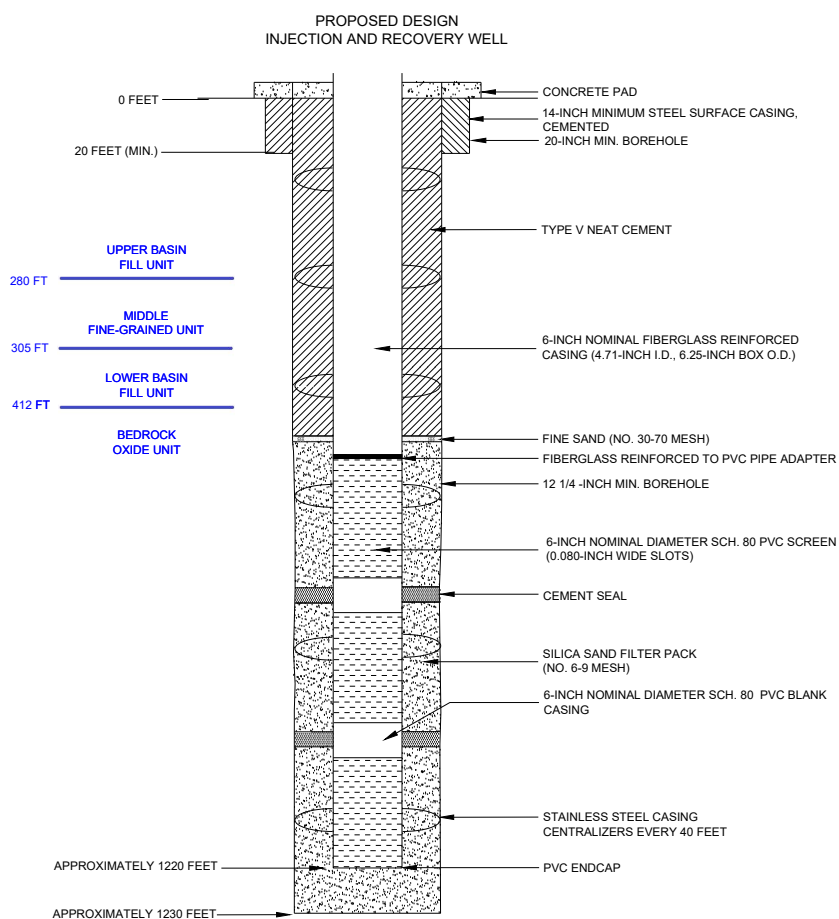
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 46 TYPICAL INJECTION AND RECOVERY WELL

SCALE: AS SHOWN
JULY 2019

FIGURE E-18

TABLE E-18

WELLS WITHIN RESOURCE BLOCK 46

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
344	848402	746528	46	412	452	1220
345	848685	746202	46	412	452	1220
346	848614	746131	46	412	452	1220
347	848543	746061	46	412	452	1220
348	848472	746131	46	412	452	1220
349	848543	746202	46	412	452	1220
350	848614	746273	46	412	452	1220
351	848685	746273	46	412	452	1220
352	848614	746202	46	412	452	1220
353	848543	746131	46	412	452	1220
354	848331	746131	46	412	452	1220
355	848402	746202	46	412	452	1220
356	848472	746273	46	412	452	1220
357	848543	746343	46	412	452	1220
358	848614	746343	46	412	452	1220
359	848543	746273	46	412	452	1220
360	848472	746202	46	412	452	1220
361	848402	746131	46	412	452	1220
362	848331	746061	46	412	452	1220
363	848260	746202	46	412	452	1220
364	848331	746273	46	412	452	1220
365	848402	746343	46	412	452	1220
366	848472	746414	46	412	452	1220
367	848543	746414	46	412	452	1220
368	848472	746343	46	412	452	1220
369	848402	746273	46	412	452	1220
370	848331	746202	46	412	452	1220
371	848260	746131	46	412	452	1220
372	848472	746485	46	412	452	1220
373	848402	746414	46	412	452	1220
374	848331	746343	46	412	452	1220
375	848260	746273	46	412	452	1220
376	848190	746202	46	412	452	1220
377	848190	746273	46	412	452	1220
378	848260	746343	46	412	452	1220
379	848331	746414	46	412	452	1220
380	848402	746485	46	412	452	1220
381	848331	746485	46	412	452	1220
382	848260	746414	46	412	452	1220

TABLE E-18**WELLS WITHIN RESOURCE BLOCK 46**

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
383	848190	746343	46	412	452	1220
384	848119	746273	46	412	452	1220
386	848543	746485	46	412	452	1220
388	848614	746414	46	412	452	1220
389	848685	746343	46	412	452	1220
390	848756	746272	46	412	452	1220
414	848402	746061	46	412	452	1220
415	848471	746061	46	412	452	1220
416	848402	745990	46	412	452	1220
417	848472	745990	46	412	452	1220

Notes:*ft bgs = feet below ground surface*

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 47 Wells - See Attached Table E-19

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.050530

Surface Location

NW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.429954

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 47. There are 49 Class III multi-use injection/ recovery wells, planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out.

The work performed includes plugging and abandonment of the Class III wells in resource block 47. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figure E-19.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

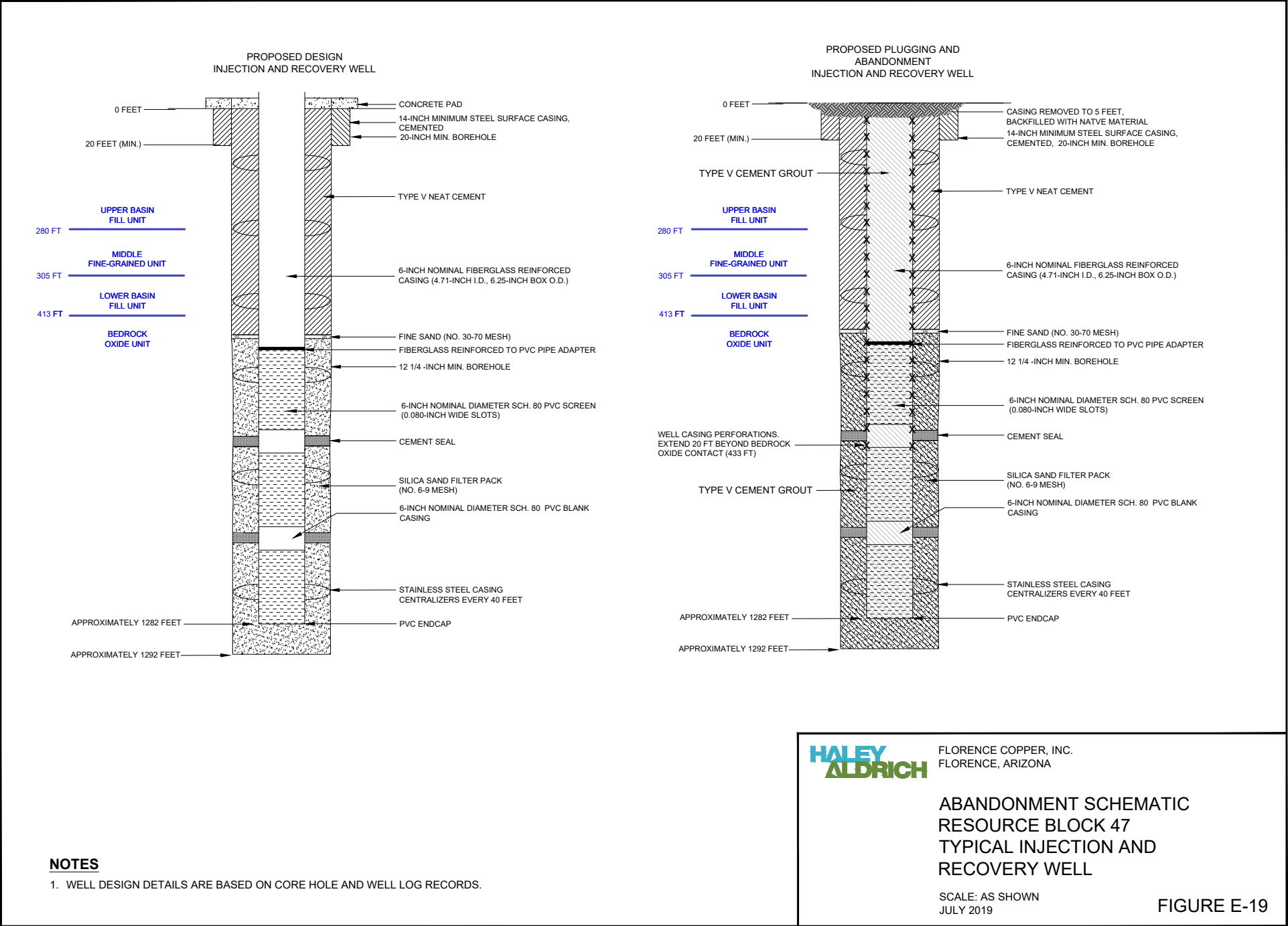


TABLE E-19

WELLS WITHIN RESOURCE BLOCK 47

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
92	849038	746061	47	413	453	1282
93	849109	746131	47	413	453	1282
94	849109	746202	47	413	453	1282
95	849038	746131	47	413	453	1282
96	848967	746202	47	413	453	1282
97	849038	746273	47	413	453	1282
98	849109	746273	47	413	453	1282
99	849038	746194	47	413	453	1282
100	848967	746131	47	413	453	1282
101	848897	746273	47	413	453	1282
102	848967	746343	47	413	453	1282
103	849038	746343	47	413	453	1282
104	848967	746273	47	413	453	1282
105	848897	746202	47	413	453	1282
106	848967	746414	47	413	453	1282
107	848897	746343	47	413	453	1282
108	848816	746273	47	413	453	1282
109	849109	746485	47	413	453	1282
110	849038	746485	47	413	453	1282
111	849109	746414	47	413	453	1282
112	849038	746414	47	413	453	1282
113	849109	746343	47	413	453	1282
114	849109	746007	47	413	453	1282
115	849109	746061	47	413	453	1282
116	849321	746131	47	413	453	1282
117	849250	746131	47	413	453	1282
118	849250	746202	47	413	453	1282
119	849321	746273	47	413	453	1282
120	849250	746273	47	413	453	1282
121	849179	746202	47	413	453	1282
122	849179	746031	47	413	453	1282
123	849250	746061	47	413	453	1282
124	849179	746061	47	413	453	1282
125	849179	746131	47	413	453	1282
126	849180	746272	47	413	453	1282
127	849250	746343	47	413	453	1282
128	849179	746343	47	413	453	1282
129	849179	746414	47	413	453	1282
141	849109	746555	47	413	453	1282

TABLE E-19**WELLS WITHIN RESOURCE BLOCK 47**

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
187	849179	746556	47	413	453	1282
197	849382	746202	47	413	453	1282
198	849462	746273	47	413	453	1282
204	849392	746273	47	413	453	1282
205	849321	746202	47	413	453	1282
206	849392	746343	47	413	453	1282
211	849321	746343	47	413	453	1282
214	849250	746485	47	413	453	1282
215	849179	746485	47	413	453	1282
217	849250	746414	47	413	453	1282

Notes:*ft bgs = feet below ground surface*

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 48 Wells - See Attached Table E-20

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.050486

Surface Location

NW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.427659

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 48. There are 45 Class III multi-use injection/ recovery wells, planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out.

The work performed includes plugging and abandonment of the Class III wells in resource block 48. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figure E-20.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

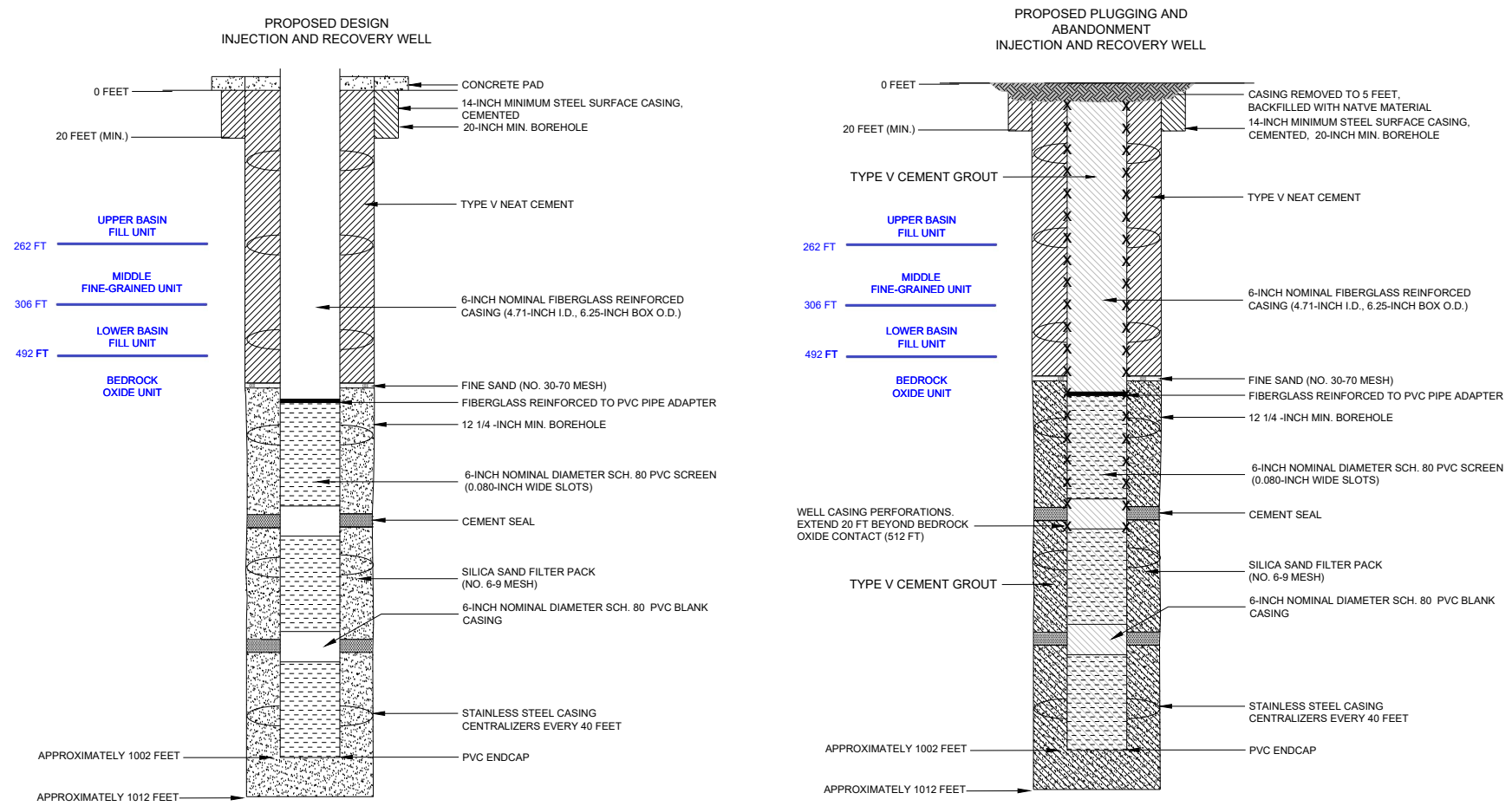
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

**ABANDONMENT SCHEMATIC
RESOURCE BLOCK 48
TYPICAL INJECTION AND
RECOVERY WELL**

SCALE: AS SHOWN
JULY 2019

FIGURE E-20

TABLE E-20

WELLS WITHIN RESOURCE BLOCK 48

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
219	849816	746556	48	492	532	1002
220	849887	746556	48	492	532	1002
222	849745	746273	48	492	532	1002
223	849816	746273	48	492	532	1002
224	849745	746226	48	492	532	1002
226	849604	746273	48	492	532	1002
227	849674	746343	48	492	532	1002
228	849745	746343	48	492	532	1002
229	849674	746273	48	492	532	1002
230	849604	746202	48	492	532	1002
232	849674	746414	48	492	532	1002
233	849604	746343	48	492	532	1002
234	849533	746273	48	492	532	1002
237	849816	746485	48	492	532	1002
238	849745	746485	48	492	532	1002
239	849816	746414	48	492	532	1002
240	849745	746414	48	492	532	1002
241	849816	746343	48	492	532	1002
242	849887	746343	48	492	532	1002
243	849887	746485	48	492	532	1002
244	849887	746414	48	492	532	1002
267	850099	746343	48	492	532	1002
269	850099	746273	48	492	532	1002
270	849957	746343	48	492	532	1002
271	850028	746414	48	492	532	1002
273	850028	746343	48	492	532	1002
274	849957	746273	48	492	532	1002
276	849957	746414	48	492	532	1002
277	849957	746485	48	492	532	1002
775	849816	745990	48	492	532	1002
776	849887	745990	48	492	532	1002
777	849887	746061	48	492	532	1002
780	849957	746061	48	492	532	1002
781	850028	746131	48	492	532	1002
783	850028	746171	48	492	532	1002
784	849957	746131	48	492	532	1002
933	849745	746061	48	492	532	1002
934	849816	746131	48	492	532	1002
935	849816	746162	48	492	532	1002

TABLE E-20**WELLS WITHIN RESOURCE BLOCK 48**

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
936	849745	746131	48	492	532	1002
941	849674	746107	48	492	532	1002
950	849816	746061	48	492	532	1002
951	849887	746181	48	492	532	1002
952	849887	746131	48	492	532	1002
966	849957	746171	48	492	532	1002

Notes:*ft bgs = feet below ground surface*

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 49 Wells - See Attached Table E-21

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.050537

Surface Location

NE 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.425633

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 49. There are 19 Class III multi-use injection/ recovery wells, 2 dedicated Class III observation, and 5 Class III perimeter wells planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out. The dedicated perimeter observation well will have a design and depth similar to the injection and recovery wells, but will not have a segmented well screen.

The work performed includes plugging and abandonment of the Class III wells in resource block 49. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figures E-21a and E-21b.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

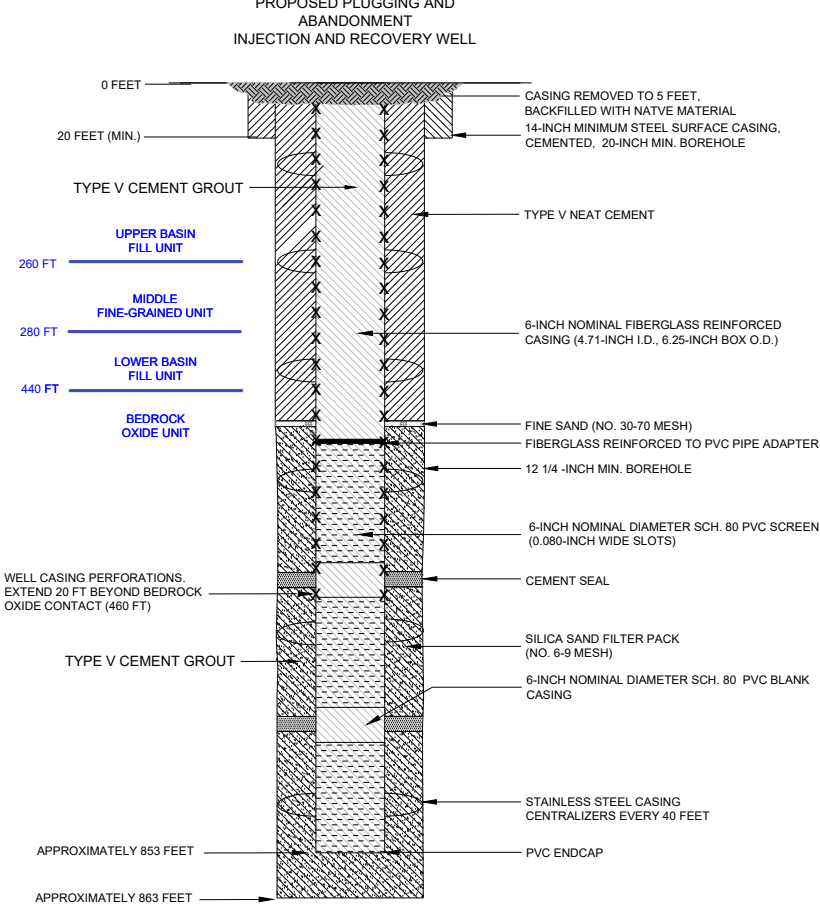
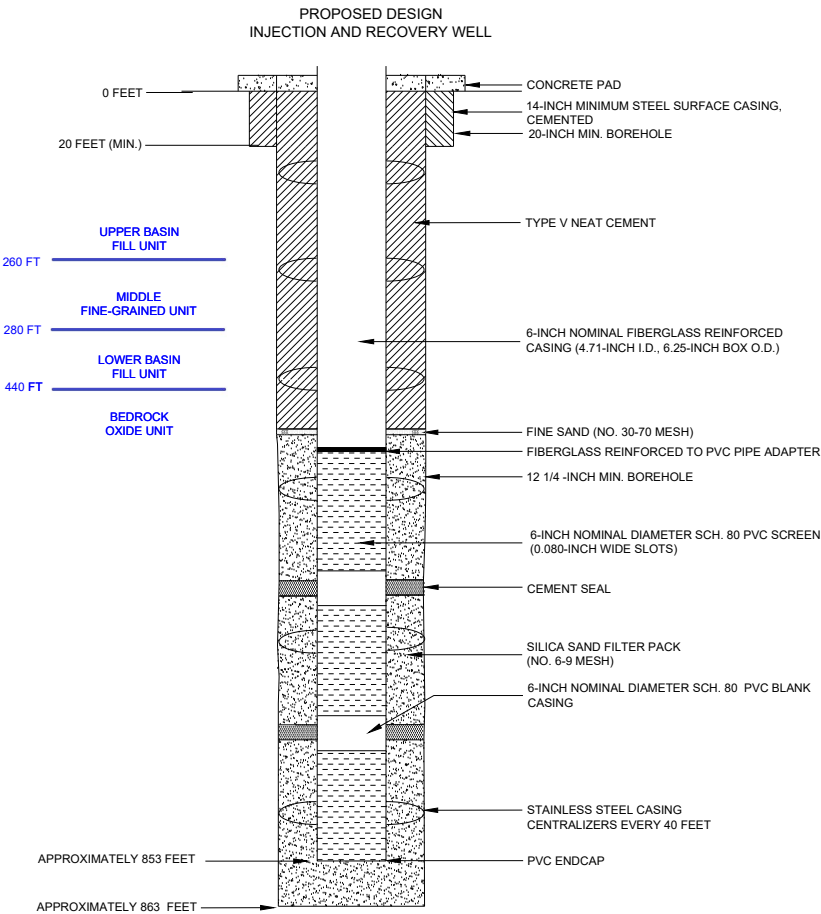
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

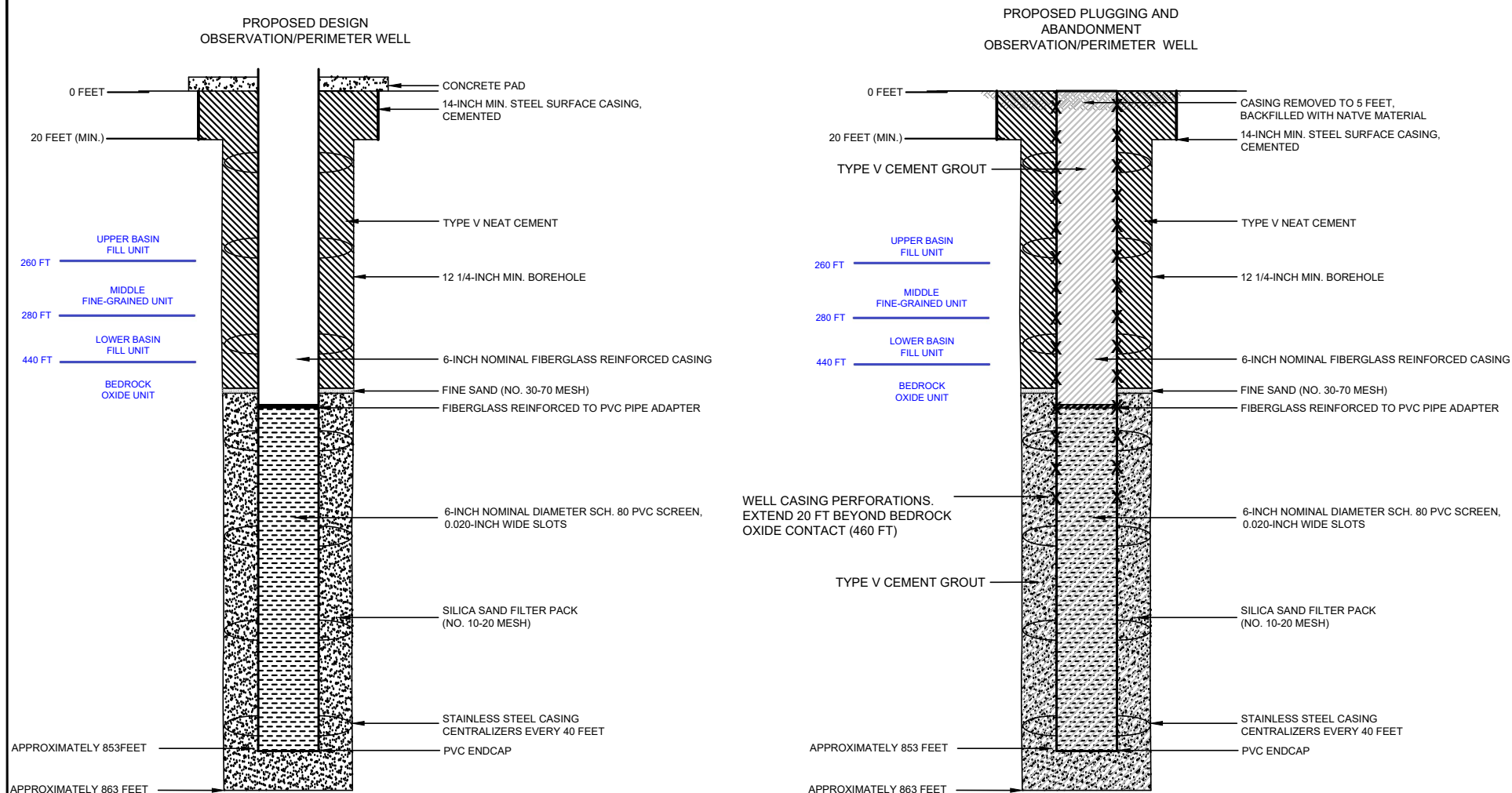


FLORENCE COPPER, INC.
FLORENCE, ARIZONA

**ABANDONMENT SCHEMATIC
RESOURCE BLOCK 49
TYPICAL INJECTION AND
RECOVERY WELL**

SCALE: AS SHOWN
JULY 2019

FIGURE E-21a



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 49 OBSERVATION/PERIMETER WELL

JULY 2019
SCALE: AS SHOWN

FIGURE E-21b

TABLE E-21
WELLS WITHIN RESOURCE BLOCK 49
 FLORENCE COPPER PROJECT
 FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
258	850523	746556	49	440	480	853
266	850240	746273	49	440	480	853
284	850523	746414	49	440	480	853
285	850452	746343	49	440	480	853
286	850381	746273	49	440	480	853
287	850381	746343	49	440	480	853
288	850311	746343	49	440	480	853
289	850452	746485	49	440	480	853
292	850452	746414	49	440	480	853
293	850381	746414	49	440	480	853
321	850452	746273	49	440	480	853
322	850523	746343	49	440	480	853
323	850523	746273	49	440	480	853
801	850523	746061	49	440	480	853
805	850523	745990	49	440	480	853
806	850452	746098	49	440	480	853
807	850523	746106	49	440	480	853
808	850452	746061	49	440	480	853
809	850381	746131	49	440	480	853
O15	850664	746344	49	440	480	853
O16	850664	745990	49	440	480	853
P27	850594	746556	49	440	480	853
P28	850594	746414	49	440	480	853
P29	850594	746273	49	440	480	853
P30	850594	746106	49	440	480	853
P31	850594	745919	49	440	480	853

Notes:

ft bgs = feet below ground surface

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 52 Wells - See Attached Table E-22

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.049763

Surface Location

NW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.435705

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 52. There is 1 Class III multi-use injection/ recovery well, planned for construction in this block. The injection and recovery well will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out.

The work performed includes plugging and abandonment of the Class III wells in resource block 52. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figure E-22.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

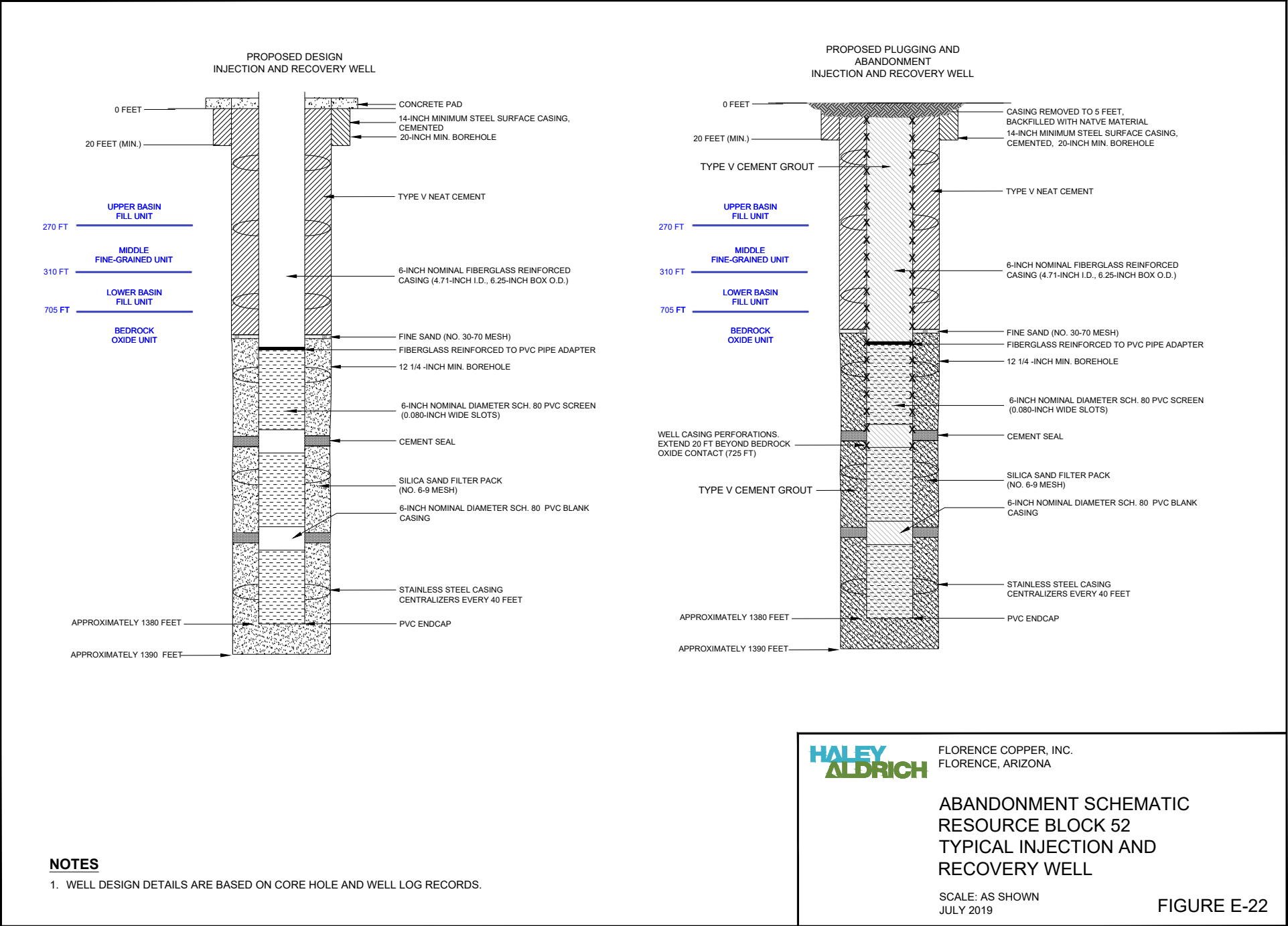


TABLE E-22
WELLS WITHIN RESOURCE BLOCK 52
 FLORENCE COPPER PROJECT
 FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
907	846988	745919	52	705	745	1380

Notes:

ft bgs = feet below ground surface

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 53 Wells - See Attached Table E-23

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.049763

Surface Location

NW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.435705

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 53. There are 49 Class III multi-use injection/ recovery and one Class III perimeter well planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out. The dedicated perimeter well will have a design and depth similar to the injection and recovery wells, but will not have a segmented well screen.

The work performed includes plugging and abandonment of the Class III wells in resource block 53. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figure E-23.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

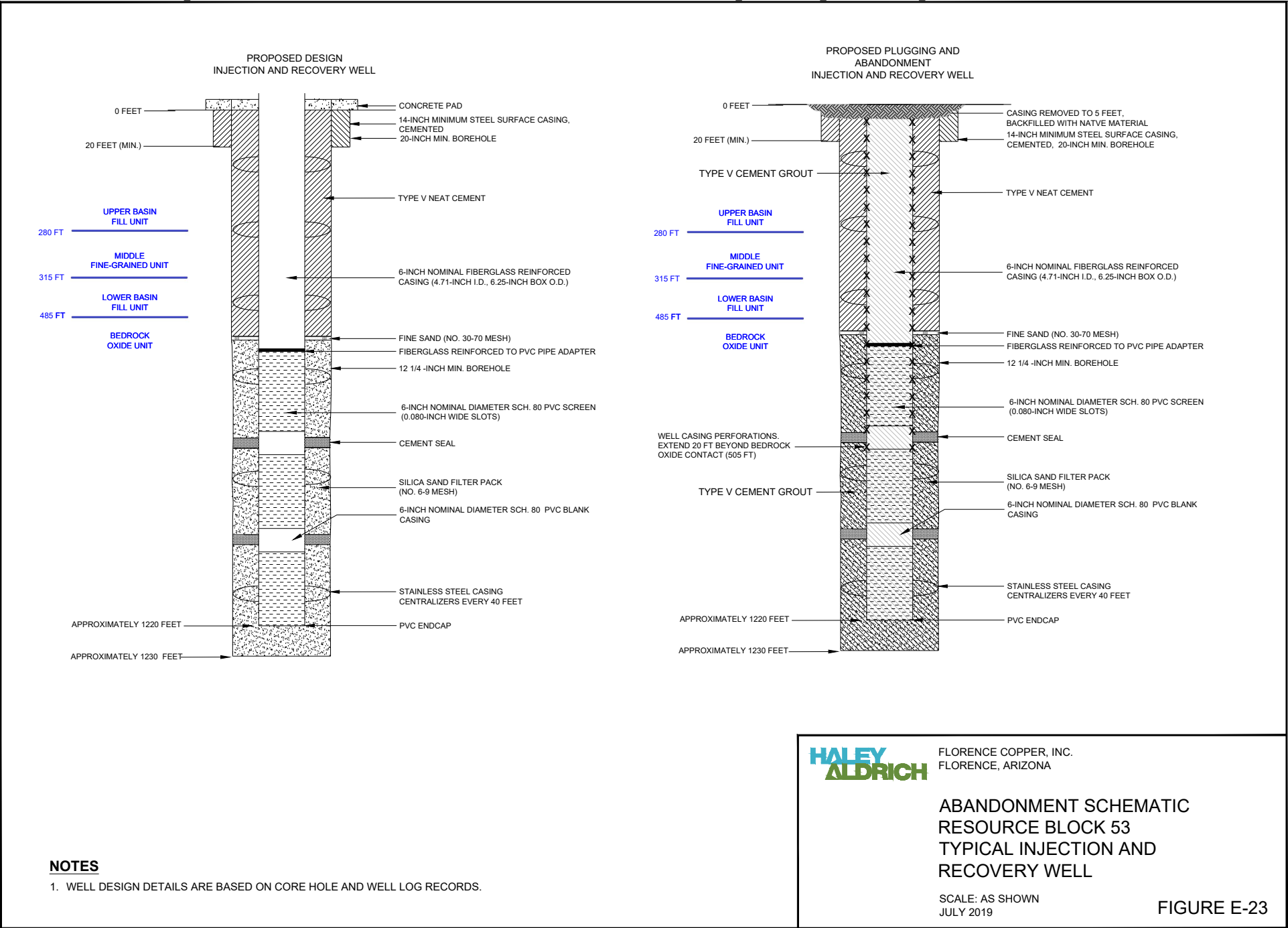


TABLE E-23

WELLS WITHIN RESOURCE BLOCK 53

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
419 (PTF)	847624	745990	53	485	525	1220
430	847695	745919	53	485	525	1220
431	847553	745990	53	485	525	1220
432	847624	745919	53	485	525	1220
482	847483	746131	53	485	525	1220
483	847412	746202	53	485	525	1220
486 (PTF)	847553	746061	53	485	525	1220
487	847412	745990	53	485	525	1220
488	847482	746061	53	485	525	1220
489	847412	746061	53	485	525	1220
490	847341	745990	53	485	525	1220
491	847200	745990	53	485	525	1220
492	847270	746060	53	485	525	1220
493	847341	746131	53	485	525	1220
494	847412	746131	53	485	525	1220
495	847341	746060	53	485	525	1220
496	847270	745990	53	485	525	1220
497	847341	746202	53	485	525	1220
498	847270	746131	53	485	525	1220
499	847200	746060	53	485	525	1220
500	847129	745990	53	485	525	1220
501	847482	745990	53	485	525	1220
502	847412	745848	53	485	525	1220
503	847341	745919	53	485	525	1220
504	847270	745848	53	485	525	1220
505	847270	745919	53	485	525	1220
506	847200	745919	53	485	525	1220
508	847129	745919	53	485	525	1220
509	847058	745919	53	485	525	1220
510	847553	745919	53	485	525	1220
511	847482	745919	53	485	525	1220
512	847412	745919	53	485	525	1220
2095	847481	745776	53	485	525	1220
2096	847552	745847	53	485	525	1220
2097	847552	745776	53	485	525	1220
2098	847623	745847	53	485	525	1220
2204	847411	745635	53	485	525	1220
2205	847481	745705	53	485	525	1220
2206	847411	745705	53	485	525	1220

TABLE E-23**WELLS WITHIN RESOURCE BLOCK 53**

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
2267	847340	745705	53	485	525	1220
2268	847366	745660	53	485	525	1220
2269	847340	745776	53	485	525	1220
2270	847269	745721	53	485	525	1220
2271	847199	745776	53	485	525	1220
2354	847412	745776	53	485	525	1220
2355	847269	745776	53	485	525	1220
2356	847340	745847	53	485	525	1220
2358	847199	745847	53	485	525	1220
2361	847481	745847	53	485	525	1220
P76	847129	745848	53	485	525	1220

Notes:*ft bgs = feet below ground surface*

(PTF) Denotes existing PTF ISCR well

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 54 Wells - See Attached Table E-24

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.049920

Surface Location

NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.433474

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 54. There are 50 Class III multi-use injection/ recovery wells, planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out.

The work performed includes plugging and abandonment of the Class III wells in resource block 54. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figure E-24.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

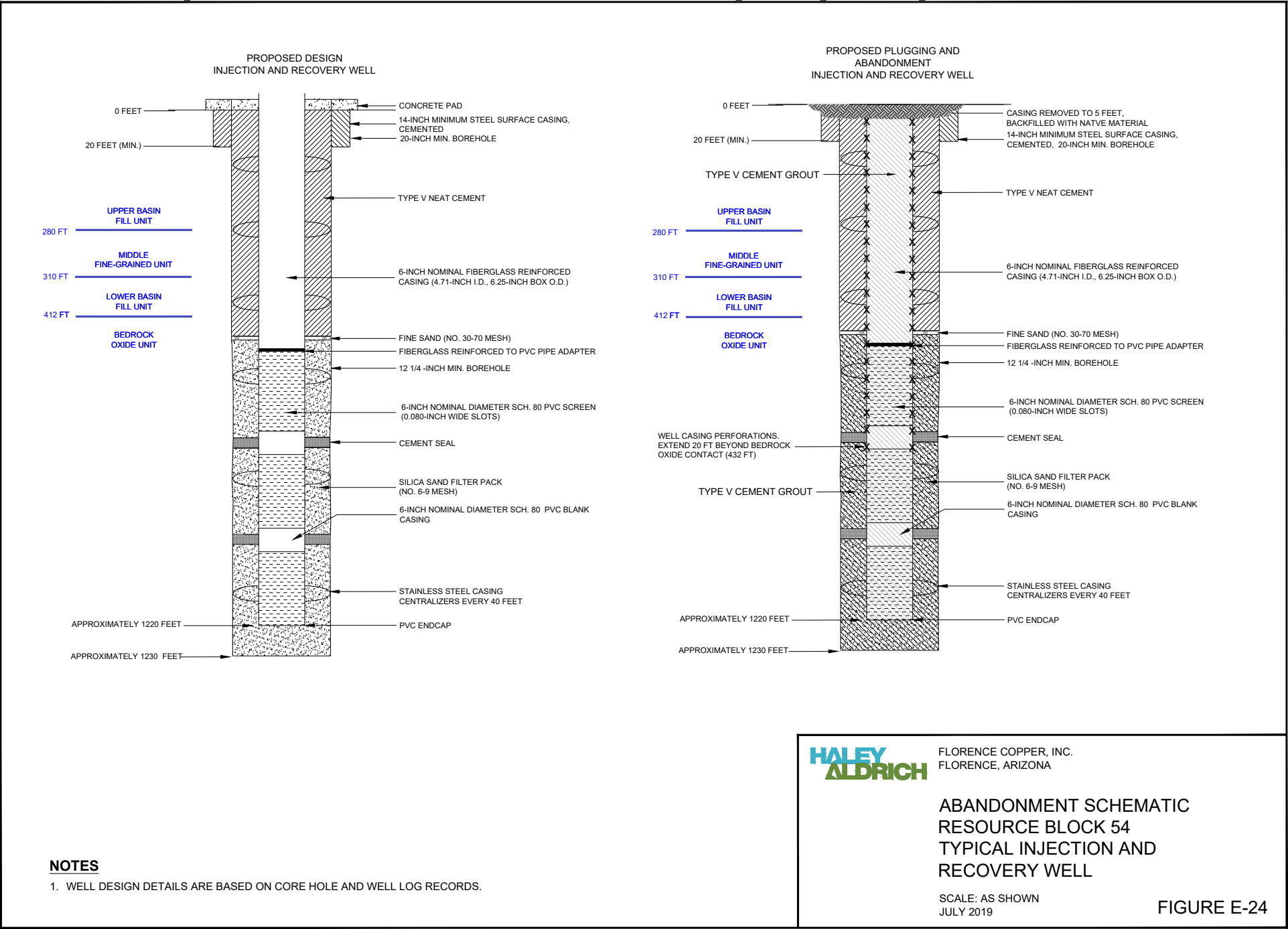


TABLE E-24

WELLS WITHIN RESOURCE BLOCK 54

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
433	847836	745990	54	412	452	1220
434	847907	746061	54	412	452	1220
435	847977	746131	54	412	452	1220
436	847977	745990	54	412	452	1220
437	847907	745990	54	412	452	1220
438	847977	746061	54	412	452	1220
439	848260	746061	54	412	452	1220
440	848260	745990	54	412	452	1220
441	848190	746131	54	412	452	1220
442	848190	746061	54	412	452	1220
443	848119	746131	54	412	452	1220
444	848190	745990	54	412	452	1220
445	848048	745990	54	412	452	1220
446	848119	745990	54	412	452	1220
447	848119	746061	54	412	452	1220
448	848048	746061	54	412	452	1220
449	848048	746131	54	412	452	1220
450	847836	745848	54	412	452	1220
451	847765	745919	54	412	452	1220
453	847977	745919	54	412	452	1220
454	847907	745919	54	412	452	1220
455	847836	745919	54	412	452	1220
456	847977	745848	54	412	452	1220
457	848260	745848	54	412	452	1220
458	848260	745919	54	412	452	1220
459	848190	745919	54	412	452	1220
460	848119	745919	54	412	452	1220
461	848048	745919	54	412	452	1220
462	848119	745848	54	412	452	1220
466	848119	746202	54	412	452	1220
468	848048	746202	54	412	452	1220
469	848402	745919	54	412	452	1220
470	848331	745990	54	412	452	1220
471	848331	745919	54	412	452	1220
2109	847976	745705	54	412	452	1220
2116	847906	745776	54	412	452	1220
2124	847906	745847	54	412	452	1220
2125	847976	745776	54	412	452	1220
2126	848118	745635	54	412	452	1220

TABLE E-24**WELLS WITHIN RESOURCE BLOCK 54**

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
2127	848188	745706	54	412	452	1220
2128	848259	745776	54	412	452	1220
2129	848330	745847	54	412	452	1220
2130	848188	745776	54	412	452	1220
2131	848118	745706	54	412	452	1220
2132	848047	745635	54	412	452	1220
2134	848048	745705	54	412	452	1220
2135	848118	745776	54	412	452	1220
2136	848047	745776	54	412	452	1220
2137	848188	745847	54	412	452	1220
2138	848047	745847	54	412	452	1220

Notes:*ft bgs = feet below ground surface*

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 55 Wells - See Attached Table E-25

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.049911

Surface Location

NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.431264

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 55. There are 44 Class III multi-use injection/ recovery wells, planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out.

The work performed includes plugging and abandonment of the Class III wells in resource block 55. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figure E-25.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

TABLE E-25

WELLS WITHIN RESOURCE BLOCK 55

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
392	848543	745990	55	336	376	474
393	848614	746061	55	336	376	474
394	848685	746131	55	336	376	474
395	848684	745990	55	336	376	474
396	848614	745990	55	336	376	474
397	848685	746061	55	336	376	474
398	848755	746202	55	336	376	474
399	848755	745990	55	336	376	474
400	848755	746061	55	336	376	474
401	848755	746131	55	336	376	474
402	848614	745919	55	336	376	474
403	848755	745955	55	336	376	474
404	848967	745990	55	336	376	474
405	848967	746061	55	336	376	474
406	848897	745990	55	336	376	474
407	848826	746061	55	336	376	474
408	848897	746131	55	336	376	474
409	848897	746061	55	336	376	474
410	848826	745990	55	336	376	474
411	848826	746202	55	336	376	474
412	848826	746131	55	336	376	474
413	848897	745955	55	336	376	474
418	848472	745919	55	336	376	474
463	848543	745848	55	336	376	474
465	848543	745919	55	336	376	474
931	849038	745891	55	336	376	474
1640	848755	745636	55	336	376	474
1653	848826	745636	55	336	376	474
1654	848897	745707	55	336	376	474
1655	848967	745778	55	336	376	474
1656	848967	745848	55	336	376	474
1657	848897	745778	55	336	376	474
1658	848826	745707	55	336	376	474
1659	849038	745848	55	336	376	474
2173	848595	745847	55	336	376	474
2186	848683	745706	55	336	376	474
2191	848697	745847	55	336	376	474
2192	848683	745776	55	336	376	474
2193	848755	745705	55	336	376	474

TABLE E-25**WELLS WITHIN RESOURCE BLOCK 55**

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
2194	848754	745776	55	336	376	474
2195	848754	745847	55	336	376	474
2200	848825	745776	55	336	376	474
2201	848896	745847	55	336	376	474
2202	848825	745847	55	336	376	474

Notes:*ft bgs = feet below ground surface*

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 56 Wells - See Attached Table E-26

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.049632

Surface Location

NW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.428882

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 56. There are 48 Class III multi-use injection/ recovery wells, planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out.

The work performed includes plugging and abandonment of the Class III wells in resource block 56. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figure E-26.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

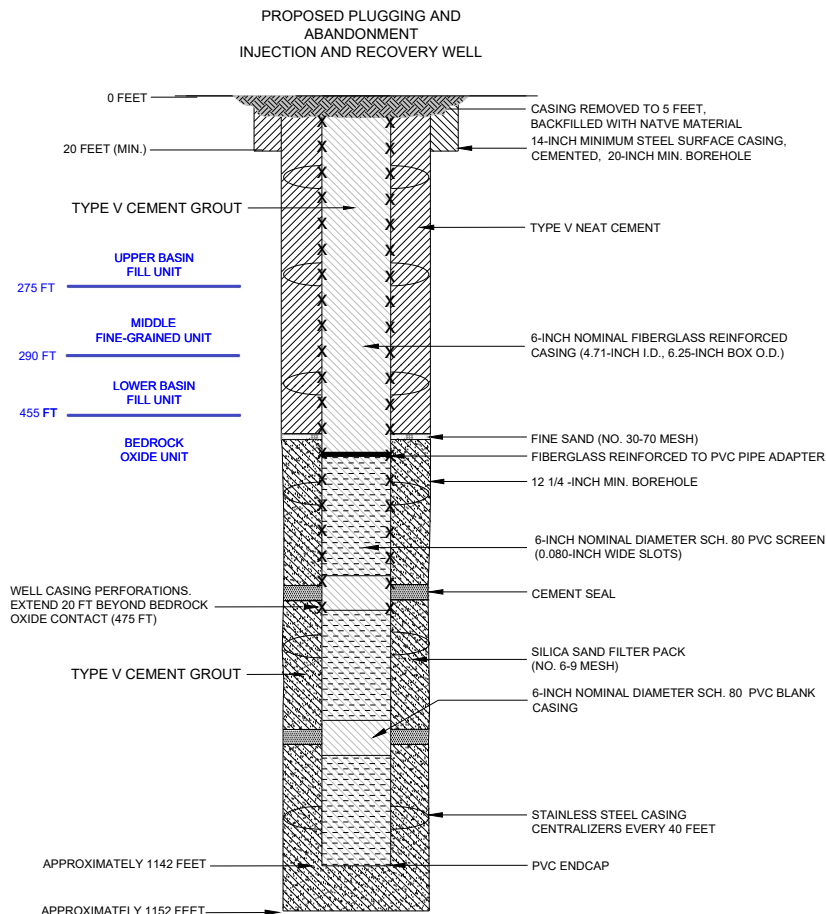
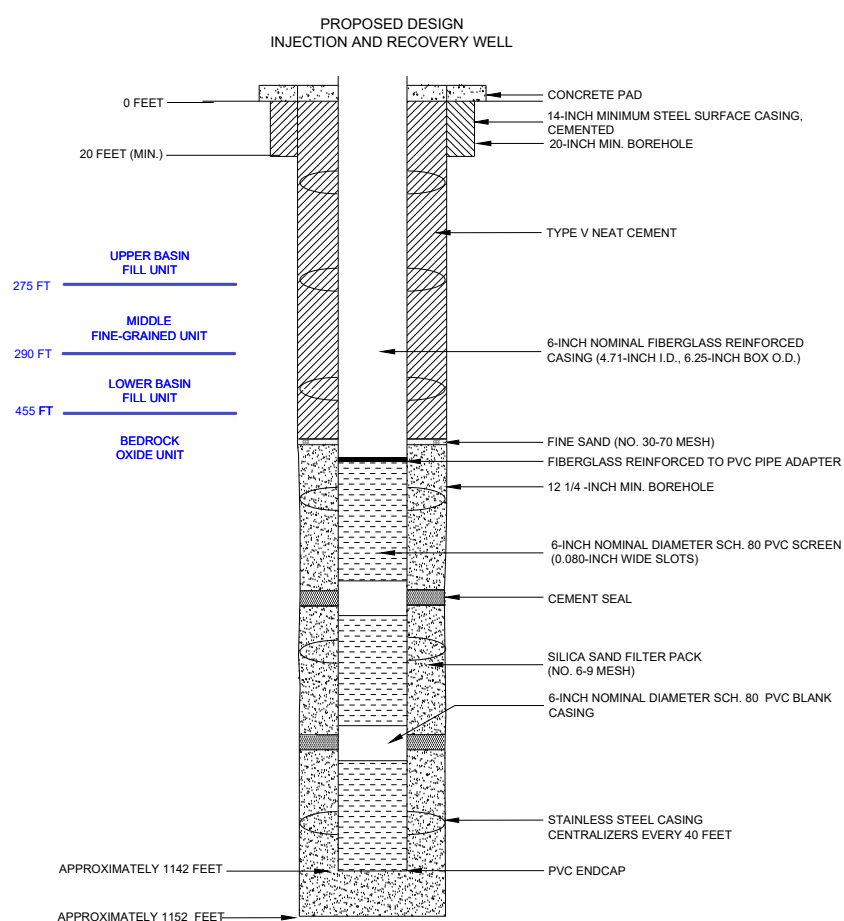
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 56 TYPICAL INJECTION AND RECOVERY WELL

SCALE: AS SHOWN
JULY 2019

FIGURE E-26

TABLE E-26

WELLS WITHIN RESOURCE BLOCK 56

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
130	849321	746077	56	455	495	1142
225	849533	746202	56	455	495	1142
231	849533	746145	56	455	495	1142
235	849462	746202	56	455	495	1142
236	849392	746131	56	455	495	1142
778	849816	745919	56	455	495	1142
779	849745	745919	56	455	495	1142
932	849674	745990	56	455	495	1142
937	849674	746061	56	455	495	1142
938	849604	745990	56	455	495	1142
939	849462	745990	56	455	495	1142
940	849533	746061	56	455	495	1142
942	849604	746061	56	455	495	1142
943	849533	745990	56	455	495	1142
944	849392	746013	56	455	495	1142
945	849462	746034	56	455	495	1142
946	849392	745990	56	455	495	1142
947	849321	745990	56	455	495	1142
948	849250	745962	56	455	495	1142
949	849745	745990	56	455	495	1142
954	849674	745848	56	455	495	1142
955	849604	745919	56	455	495	1142
956	849533	745848	56	455	495	1142
957	849533	745919	56	455	495	1142
958	849462	745919	56	455	495	1142
959	849392	745848	56	455	495	1142
960	849392	745919	56	455	495	1142
961	849321	745919	56	455	495	1142
962	849250	745919	56	455	495	1142
963	849179	745919	56	455	495	1142
964	849250	745848	56	455	495	1142
965	849674	745919	56	455	495	1142
1480	849462	745636	56	455	495	1142
1562	849533	745636	56	455	495	1142
1563	849604	745707	56	455	495	1142
1564	849674	745778	56	455	495	1142
1566	849462	745707	56	455	495	1142
1567	849533	745778	56	455	495	1142
1568	849604	745848	56	455	495	1142

TABLE E-26**WELLS WITHIN RESOURCE BLOCK 56**

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
1569	849604	745778	56	455	495	1142
1570	849533	745707	56	455	495	1142
1573	849462	745778	56	455	495	1142
1574	849392	745707	56	455	495	1142
1577	849392	745778	56	455	495	1142
1578	849462	745848	56	455	495	1142
1579	849321	745778	56	455	495	1142
1583	849321	745848	56	455	495	1142
1585	849745	745848	56	455	495	1142

Notes:*ft bgs = feet below ground surface*

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 57 Wells - See Attached Table E-27

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.049658

Surface Location

NW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.426531

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 57. There are 44 Class III multi-use injection/ recovery wells, 1 dedicated Class III observation, and 3 Class III perimeter wells planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out. The dedicated perimeter observation well will have a design and depth similar to the injection and recovery wells, but will not have a segmented well screen.

The work performed includes plugging and abandonment of the Class III wells in resource block 57. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figures E-27a and E-27b.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

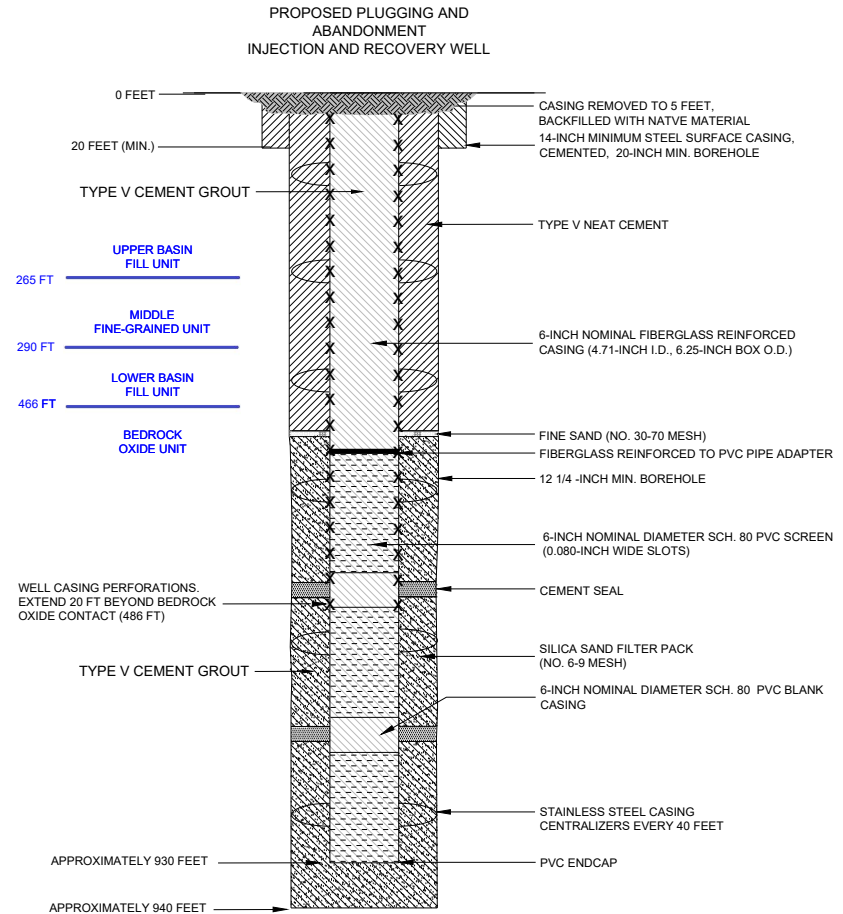
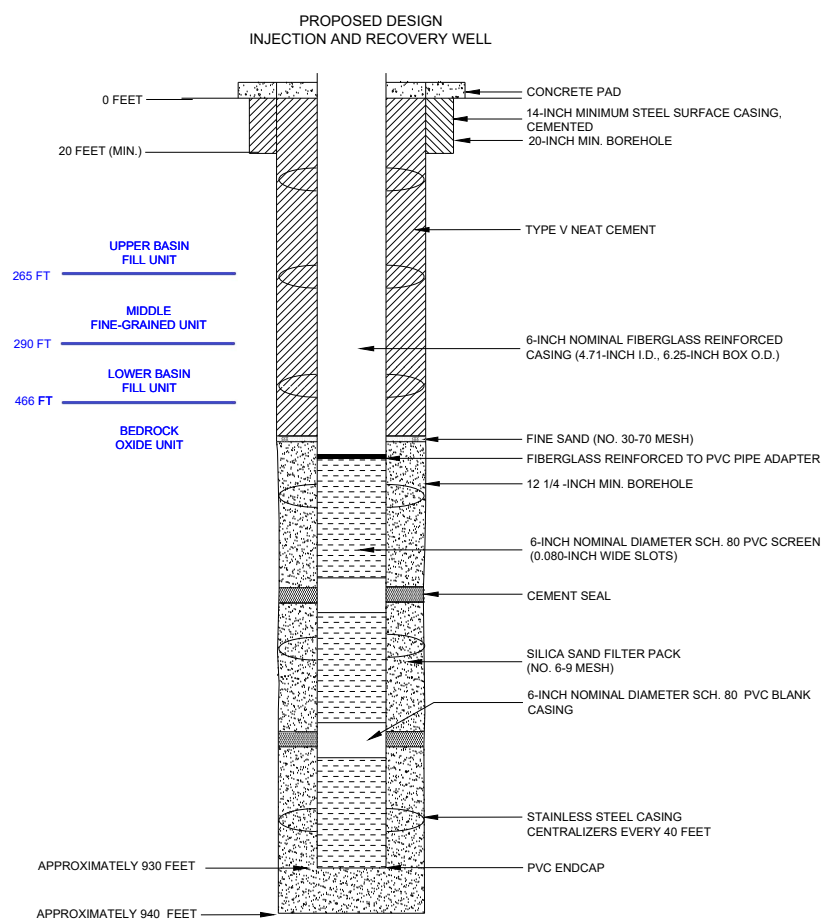
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

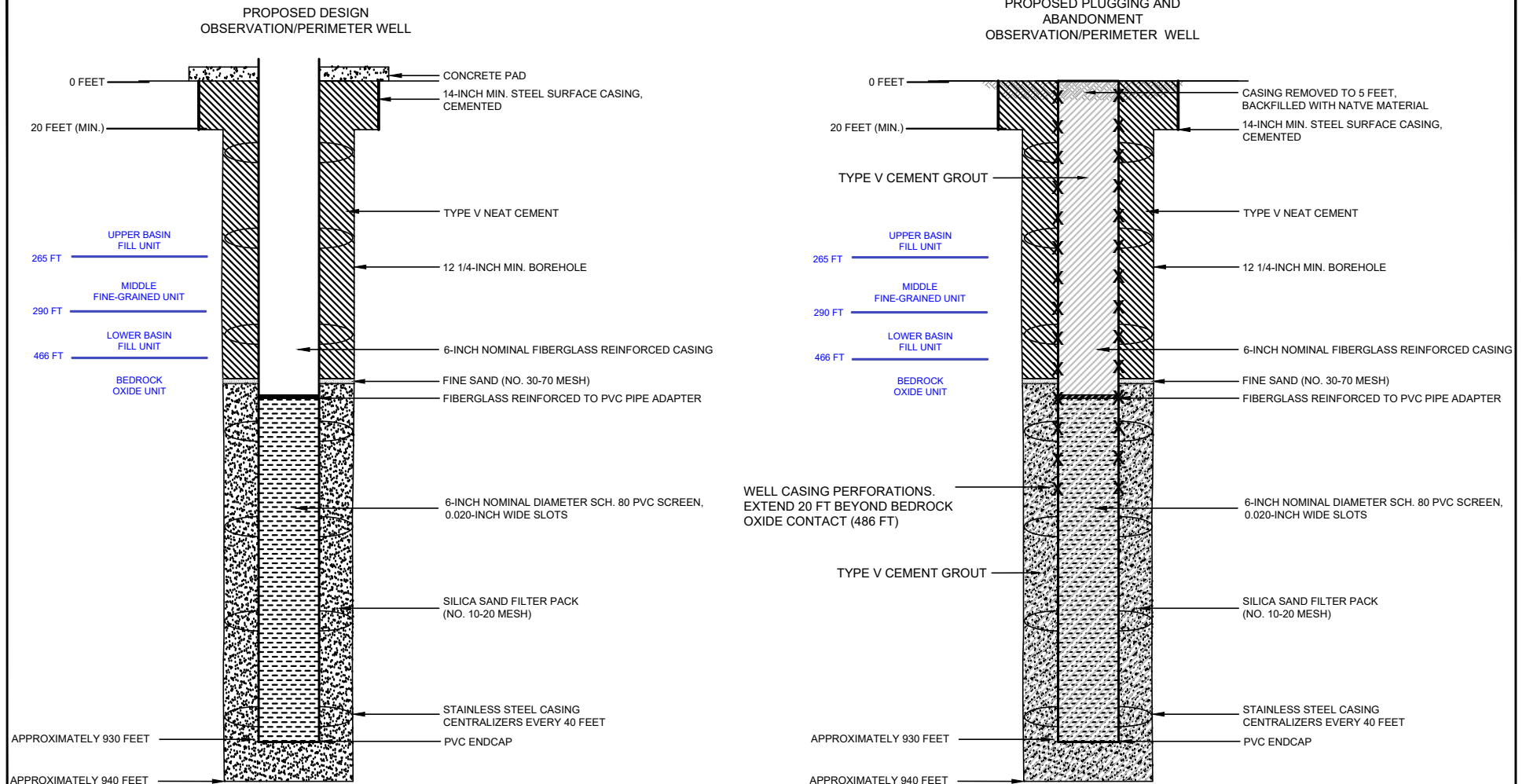


FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 57 TYPICAL INJECTION AND RECOVERY WELL

SCALE: AS SHOWN
JULY 2019

FIGURE E-27a



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 57 OBSERVATION/PERIMETER WELL

JULY 2019
SCALE: AS SHOWN

FIGURE E-27b

TABLE E-27

WELLS WITHIN RESOURCE BLOCK 57

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
786	849886	745919	57	466	506	930
787	850099	745990	57	466	506	930
788	850169	746061	57	466	506	930
789	850240	746131	57	466	506	930
790	850169	746131	57	466	506	930
791	850099	746061	57	466	506	930
792	850028	745990	57	466	506	930
793	850099	746131	57	466	506	930
794	850028	746061	57	466	506	930
795	849957	745990	57	466	506	930
796	850240	745990	57	466	506	930
797	850169	745990	57	466	506	930
798	850240	746061	57	466	506	930
810	850452	745990	57	466	506	930
811	850311	745990	57	466	506	930
1628	850240	745778	57	466	506	930
1627	850169	745849	57	466	506	930
782	850099	746164	57	466	506	930
812	850381	745990	57	466	506	930
813	850381	746061	57	466	506	930
814	850311	746061	57	466	506	930
815	850311	746131	57	466	506	930
816	850099	745849	57	466	506	930
817	850028	745919	57	466	506	930
818	849957	745848	57	466	506	930
819	849957	745919	57	466	506	930
820	850240	745919	57	466	506	930
821	850169	745919	57	466	506	930
822	850099	745919	57	466	506	930
823	850240	745849	57	466	506	930
824	850523	745919	57	466	506	930
825	850452	745919	57	466	506	930
826	850381	745919	57	466	506	930
829	850170	746163	57	466	506	930
827	850311	745919	57	466	506	930
967	850240	745636	57	466	506	930
969	850240	745707	57	466	506	930
970	850169	745636	57	466	506	930
1615	850169	745707	57	466	506	930

TABLE E-27

WELLS WITHIN RESOURCE BLOCK 57

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
1618	850099	745778	57	466	506	930
1619	850169	745778	57	466	506	930
1620	850099	745707	57	466	506	930
1624	850028	745849	57	466	506	930
1625	850028	745778	57	466	506	930
O17	850381	745778	57	466	506	930
P32	850452	745849	57	466	506	930
P33	850311	745848	57	466	506	930
P34	850311	745707	57	466	506	930

Notes:*ft bgs = feet below ground surface*

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 61 Wells - See Attached Table E-28

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.048659

Surface Location

SW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.436081

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 61. There are 10 Class III multi-use injection/ recovery wells, 3 dedicated Class III observation, and 4 Class III perimeter wells planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out. The dedicated perimeter observation well will have a design and depth similar to the injection and recovery wells, but will not have a segmented well screen.

The work performed includes plugging and abandonment of the Class III wells in resource block 61. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figures E-28a and E-28b.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

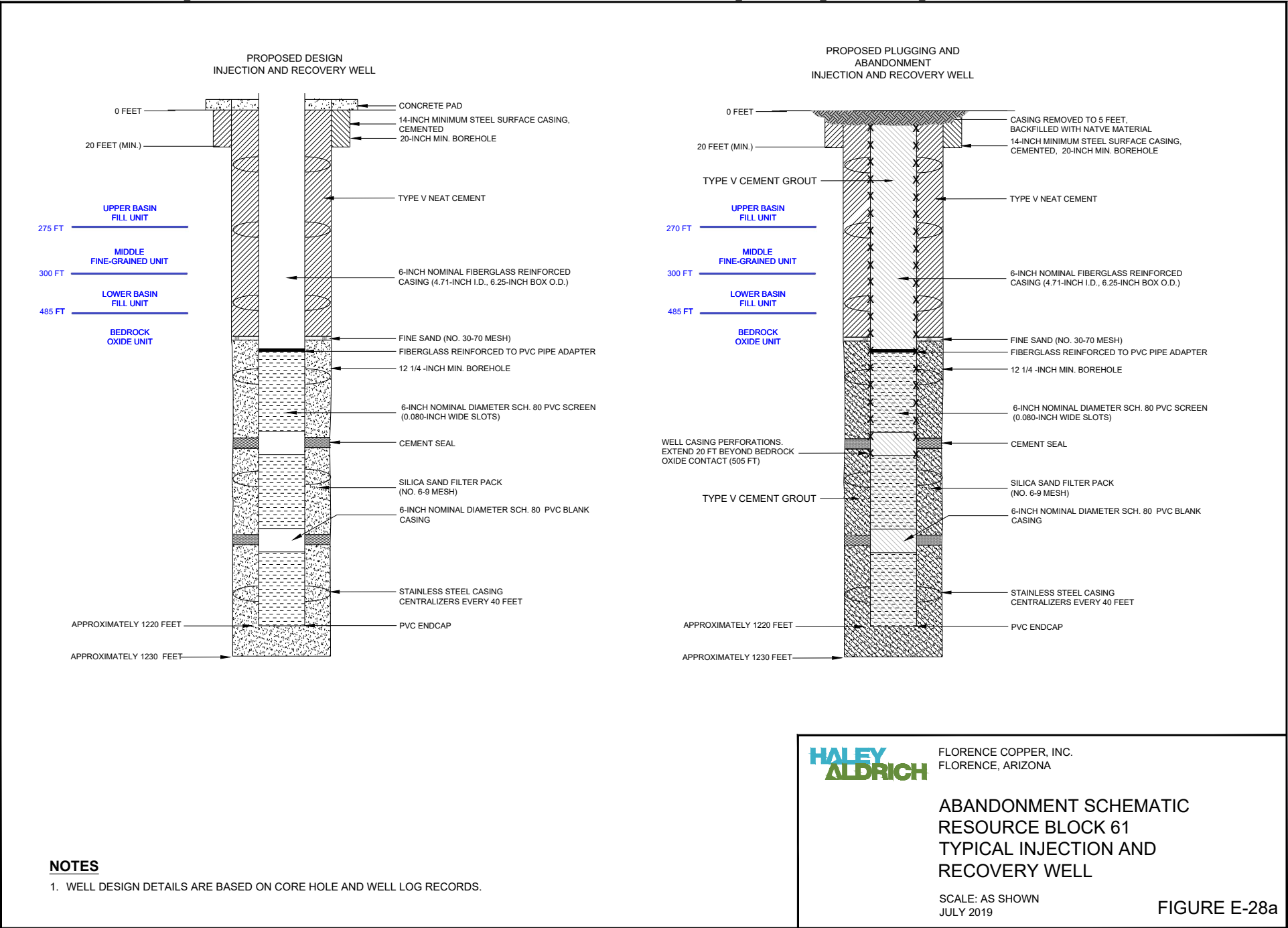
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

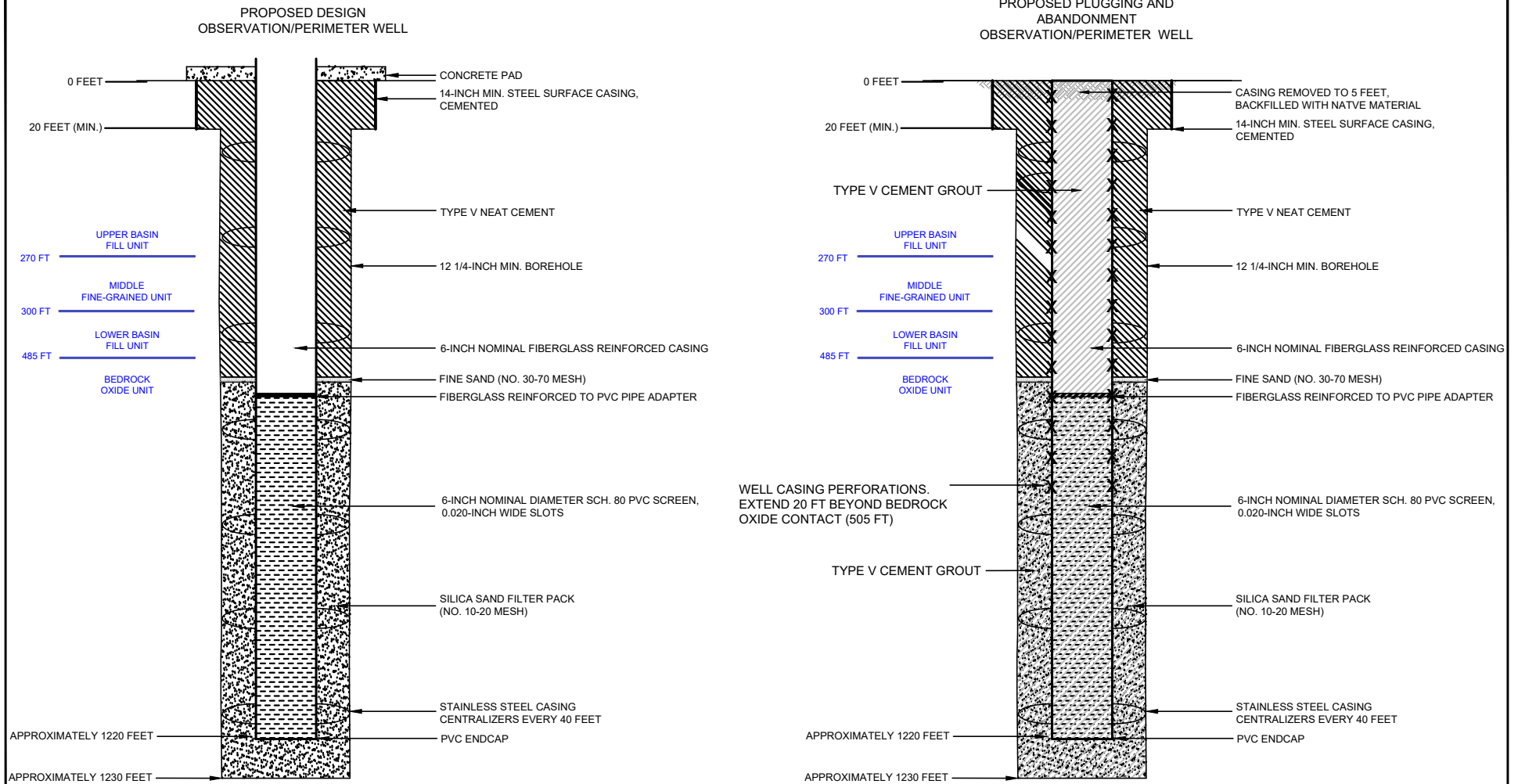
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.





NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.



FLORENCE COPPER, INC.
 FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 61 OBSERVATION/PERIMETER WELL

JULY 2019
 SCALE: AS SHOWN

FIGURE E-28b

TABLE E-28
WELLS WITHIN RESOURCE BLOCK 61
 FLORENCE COPPER PROJECT
 FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
2220	847199	745423	61	485	525	1220
2221	847269	745493	61	485	525	1220
2222	847340	745564	61	485	525	1220
2224	847269	745564	61	485	525	1220
2225	847199	745493	61	485	525	1220
2276	847199	745564	61	485	525	1220
2277	847270	745620	61	485	525	1220
2280	847174	745676	61	485	525	1220
2281	847199	745635	61	485	525	1220
O37	847057	745352	61	485	525	1220
O38	847057	745635	61	485	525	1220
O39	847057	745776	61	485	525	1220
P73	847128	745423	61	485	525	1220
P74	847128	745564	61	485	525	1220
P75	847104	745676	61	485	525	1220
P77	846988	745848	61	485	525	1220

Notes:

ft bgs = feet below ground surface

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 62 Wells - See Attached Table E-29

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.048592

Surface Location

SE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.434611

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 62. There are 51 Class III multi-use injection/ recovery wells, planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out.

The work performed includes plugging and abandonment of the Class III wells in resource block 62. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figure E-29.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

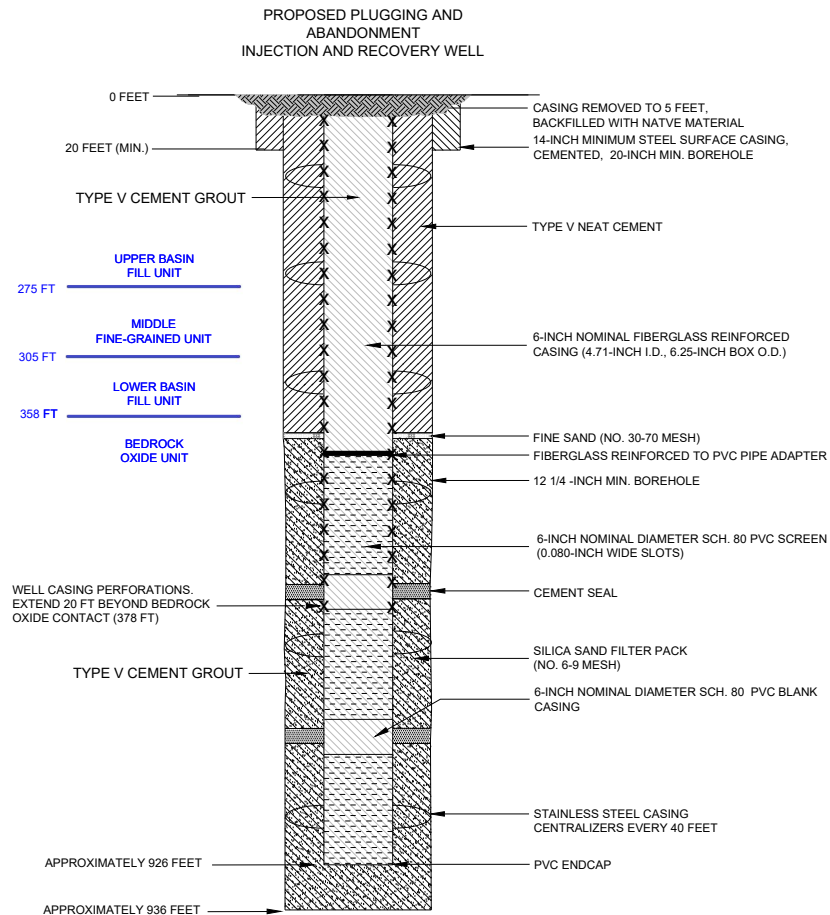
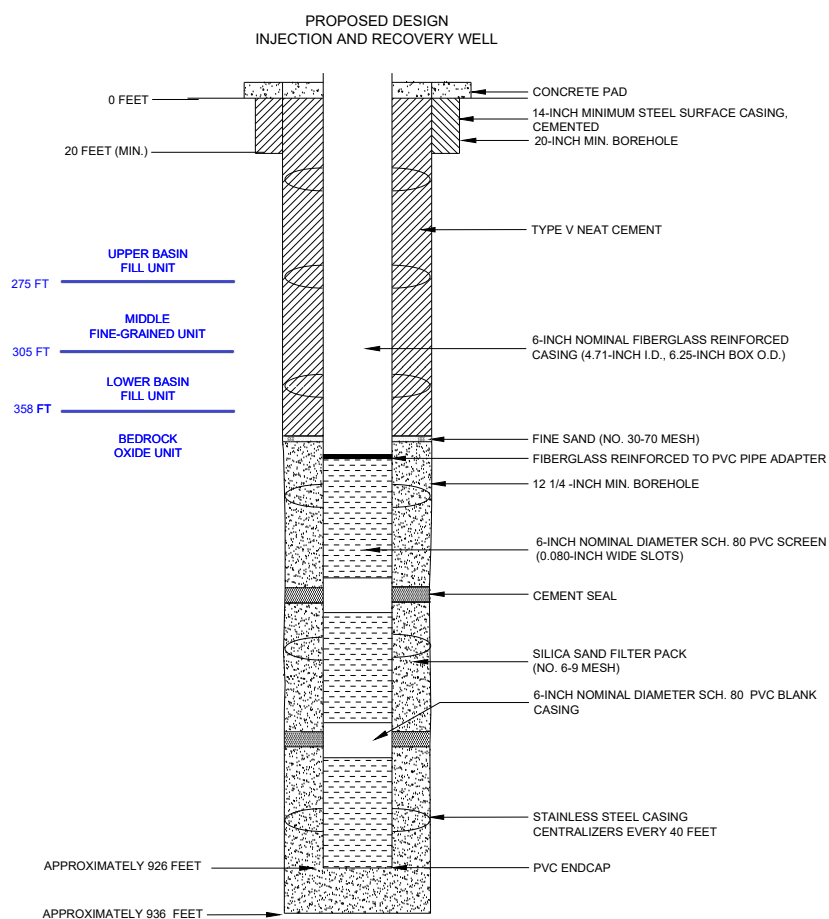
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 62 TYPICAL INJECTION AND RECOVERY WELL

SCALE: AS SHOWN
JULY 2019

FIGURE E-29

TABLE E-29

WELLS WITHIN RESOURCE BLOCK 62

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
2030	847695	745283	62	358	398	926
2099	847552	745705	62	358	398	926
2100	847623	745635	62	358	398	926
2101	847624	745705	62	358	398	926
2102	847623	745776	62	358	398	926
2103	847976	745635	62	358	398	926
2104	847906	745564	62	358	398	926
2105	847835	745493	62	358	398	926
2106	847764	745564	62	358	398	926
2107	847835	745635	62	358	398	926
2108	847906	745705	62	358	398	926
2110	847906	745635	62	358	398	926
2111	847835	745564	62	358	398	926
2112	847764	745493	62	358	398	926
2113	847694	745635	62	358	398	926
2114	847764	745705	62	358	398	926
2115	847835	745776	62	358	398	926
2117	847835	745705	62	358	398	926
2118	847764	745635	62	358	398	926
2119	847694	745564	62	358	398	926
2120	847694	745776	62	358	398	926
2121	847764	745847	62	358	398	926
2122	847764	745776	62	358	398	926
2123	847694	745705	62	358	398	926
2133	848047	745564	62	358	398	926
2139	847835	745423	62	358	398	926
2140	847906	745493	62	358	398	926
2141	847976	745564	62	358	398	926
2143	847906	745423	62	358	398	926
2144	847976	745493	62	358	398	926
2207	847552	745564	62	358	398	926
2208	847552	745635	62	358	398	926
2209	847481	745581	62	358	398	926
2210	847481	745635	62	358	398	926
2211	847577	745523	62	358	398	926
2212	847623	745493	62	358	398	926
2213	847623	745564	62	358	398	926
2214	847764	745423	62	358	398	926
2215	847694	745493	62	358	398	926

TABLE E-29

WELLS WITHIN RESOURCE BLOCK 62

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
2216	847693	745445	62	358	398	926
2217	847835	745352	62	358	398	926
2218	847473	745482	62	358	398	926
2223	847411	745527	62	358	398	926
2266	847764	745390	62	358	398	926
2237	847508	745455	62	358	398	926
2236	847693	745332	62	358	398	926
2235	847764	745281	62	358	398	926
452	847695	745848	62	358	398	926
2227	847552	745423	62	358	398	926
2229	847600	745396	62	358	398	926
2233	847623	745352	62	358	398	926

Notes:*ft bgs = feet below ground surface*

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 63 Wells - See Attached Table E-30

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.048583

Surface Location

SE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.432288

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 63. There are 51 Class III multi-use injection/ recovery wells, planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out.

The work performed includes plugging and abandonment of the Class III wells in resource block 63. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figure E-30.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

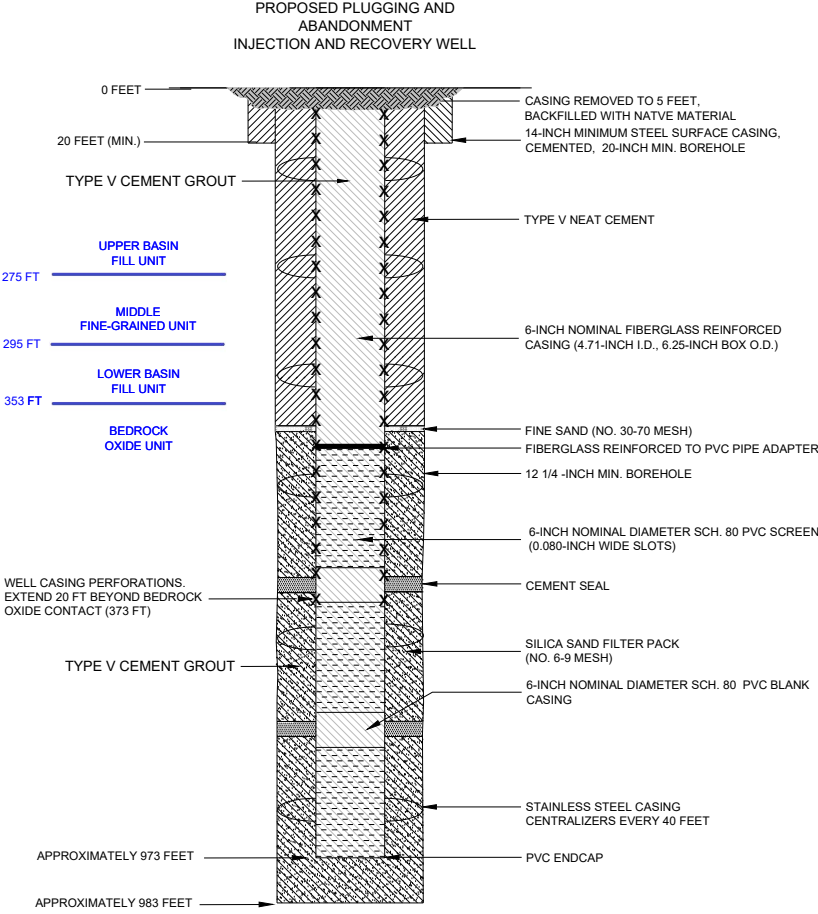
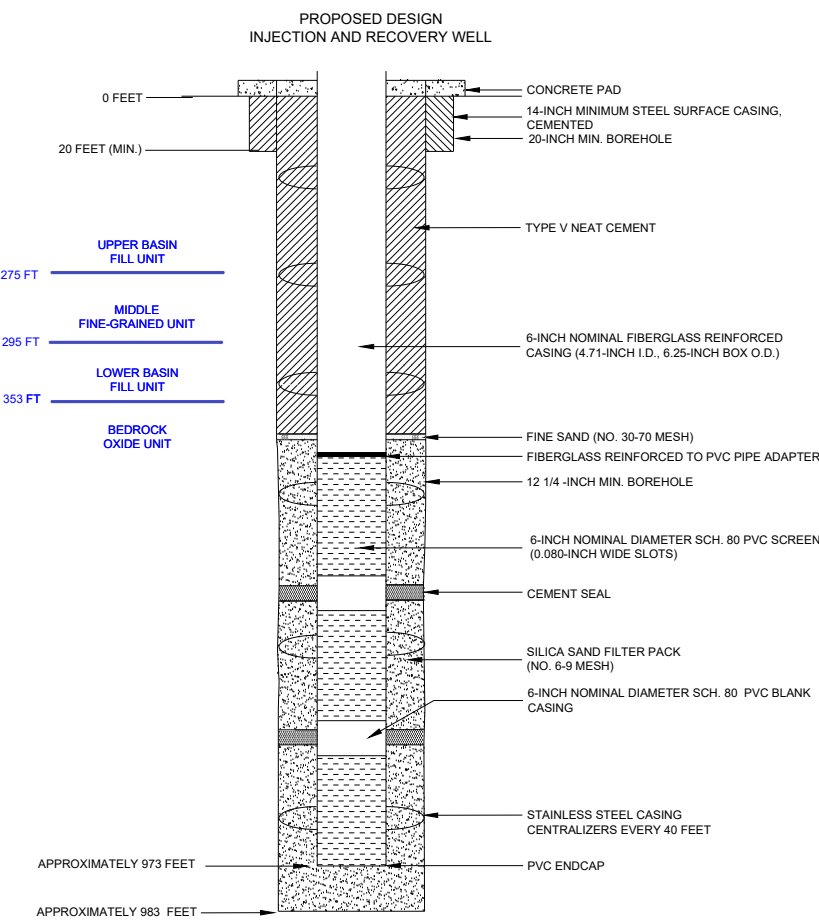
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

**ABANDONMENT SCHEMATIC
RESOURCE BLOCK 63
TYPICAL INJECTION AND
RECOVERY WELL**

SCALE: AS SHOWN
JULY 2019

FIGURE E-30

TABLE E-30

WELLS WITHIN RESOURCE BLOCK 63

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
464	848401.6491	745848.4602	63	353	393	973
1635	848543.0287	745424.2398	63	353	393	973
1636	848613.7394	745494.9505	63	353	393	973
1637	848684.4501	745565.6612	63	353	393	973
1638	848613.7394	745424.2505	63	353	393	973
1639	848684.4501	745494.9612	63	353	393	973
1641	848755.1714	745565.6826	63	353	393	973
1646	848472.3074	745282.8185	63	353	393	973
1647	848472.3074	745353.5185	63	353	393	973
1648	848401.5967	745282.8078	63	353	393	973
1652	848543.018	745353.5292	63	353	393	973
2037	848260.2064	745388.8383	63	353	393	973
2044	848330.8957	745353.5068	63	353	393	973
2145	848259.1608	745493.4174	63	353	393	973
2146	848329.8714	745564.1281	63	353	393	973
2147	848400.5821	745634.8388	63	353	393	973
2148	848471.2928	745705.5494	63	353	393	973
2149	848542.0035	745776.2601	63	353	393	973
2150	848520.449	745705.5494	63	353	393	973
2151	848471.2821	745634.8388	63	353	393	973
2152	848400.5714	745564.1281	63	353	393	973
2153	848329.8608	745520.0354	63	353	393	973
2154	848188.4608	745564.1174	63	353	393	973
2155	848259.1714	745634.8281	63	353	393	973
2156	848329.8821	745705.5388	63	353	393	973
2157	848400.5928	745776.2494	63	353	393	973
2158	848471.3035	745846.9601	63	353	393	973
2159	848471.2928	745776.2494	63	353	393	973
2160	848400.5821	745705.5388	63	353	393	973
2161	848329.8714	745634.8281	63	353	393	973
2162	848259.1608	745564.1174	63	353	393	973
2163	848188.4501	745493.4067	63	353	393	973
2164	848329.8821	745776.2388	63	353	393	973
2165	848259.1714	745705.5281	63	353	393	973
2166	848188.4608	745634.8174	63	353	393	973
2167	848117.7501	745564.1067	63	353	393	973
2168	848188.4501	745444.3655	63	353	393	973
2177	848683.4035	745634.8601	63	353	393	973
2178	848612.6928	745564.1494	63	353	393	973

TABLE E-30**WELLS WITHIN RESOURCE BLOCK 63**

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
2179	848541.9821	745493.4388	63	353	393	973
2180	848471.2714	745422.7281	63	353	393	973
2181	848329.8608	745422.7174	63	353	393	973
2182	848400.5714	745466.6131	63	353	393	973
2183	848503.1242	745531.5875	63	353	393	973
2184	848568.9288	745610.9406	63	353	393	973
2185	848622.826	745705.5601	63	353	393	973
2187	848612.6928	745634.8494	63	353	393	973
2188	848541.9821	745564.1388	63	353	393	973
2189	848471.2714	745493.4281	63	353	393	973
2190	848400.5608	745422.7174	63	353	393	973
2198	848400.5501	745352.0067	63	353	393	973

Notes:*ft bgs = feet below ground surface*

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 64 Wells - See Attached Table E-31

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.048598

Surface Location

SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.430035

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 64. There are 51 Class III multi-use injection/ recovery wells, planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out.

The work performed includes plugging and abandonment of the Class III wells in resource block 64. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figure E-31.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

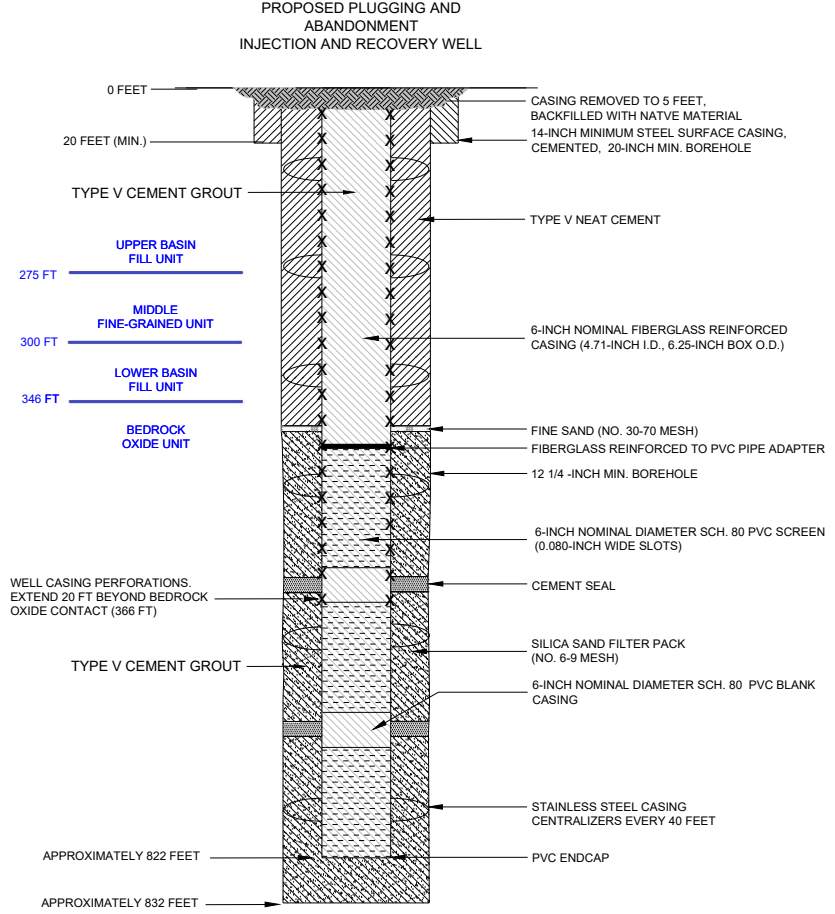
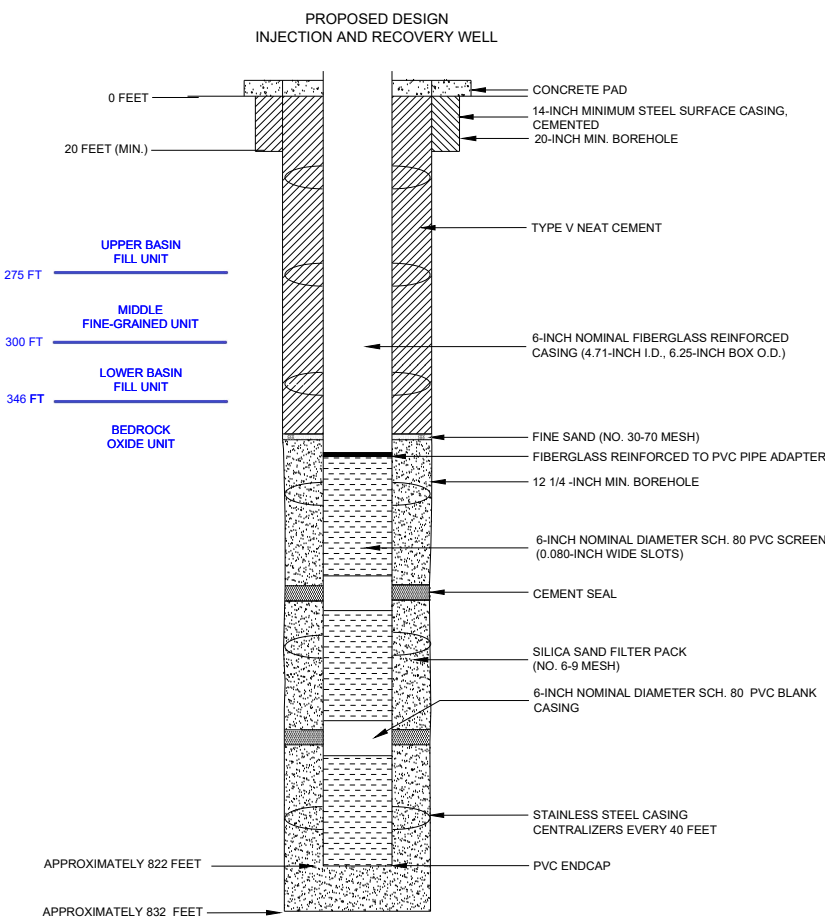
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

**ABANDONMENT SCHEMATIC
RESOURCE BLOCK 64
TYPICAL INJECTION AND
RECOVERY WELL**

SCALE: AS SHOWN
JULY 2019

FIGURE E-31

TABLE E-31

WELLS WITHIN RESOURCE BLOCK 64

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
930	849109	745913	64	346	386	822
953	849109	745848	64	346	386	822
1478	849392	745495	64	346	386	822
1479	849462	745566	64	346	386	822
1481	849392	745566	64	346	386	822
1482	849321	745495	64	346	386	822
1483	849321	745424	64	346	386	822
1484	849250	745424	64	346	386	822
1485	849250	745353	64	346	386	822
1490	849109	745283	64	346	386	822
1492	849179	745353	64	346	386	822
1493	849179	745283	64	346	386	822
1565	849392	745636	64	346	386	822
1575	849321	745636	64	346	386	822
1576	849321	745707	64	346	386	822
1580	849250	745707	64	346	386	822
1581	849250	745778	64	346	386	822
1582	849179	745778	64	346	386	822
1584	849179	745848	64	346	386	822
1661	849109	745566	64	346	386	822
1662	849109	745636	64	346	386	822
1663	849038	745566	64	346	386	822
1664	848967	745636	64	346	386	822
1665	849038	745707	64	346	386	822
1666	849109	745707	64	346	386	822
1667	849038	745636	64	346	386	822
1668	849038	745778	64	346	386	822
1669	848967	745707	64	346	386	822
1670	849109	745778	64	346	386	822
1671	849109	745495	64	346	386	822
1672	849321	745566	64	346	386	822
1673	849250	745566	64	346	386	822
1674	849250	745636	64	346	386	822
1675	849179	745636	64	346	386	822
1676	849179	745424	64	346	386	822
1677	849250	745495	64	346	386	822
1678	849179	745495	64	346	386	822
1679	849179	745566	64	346	386	822
1680	849180	745706	64	346	386	822

TABLE E-31**WELLS WITHIN RESOURCE BLOCK 64**

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
1737	848967	745424	64	346	386	822
1738	849038	745495	64	346	386	822
1739	848967	745495	64	346	386	822
1742	848897	745566	64	346	386	822
1743	848967	745566	64	346	386	822
1744	848897	745495	64	346	386	822
1746	848897	745636	64	346	386	822
1747	848826	745566	64	346	386	822
1748	849109	745424	64	346	386	822
1749	849038	745424	64	346	386	822
1761	849109	745353	64	346	386	822
1762	849038	745353	64	346	386	822

Notes:*ft bgs = feet below ground surface*

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 65 Wells - See Attached Table E-32

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.048565

Surface Location

SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.427684

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 65. There are 50 Class III multi-use injection/ recovery wells, planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out.

The work performed includes plugging and abandonment of the Class III wells in resource block 65. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figure E-32.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

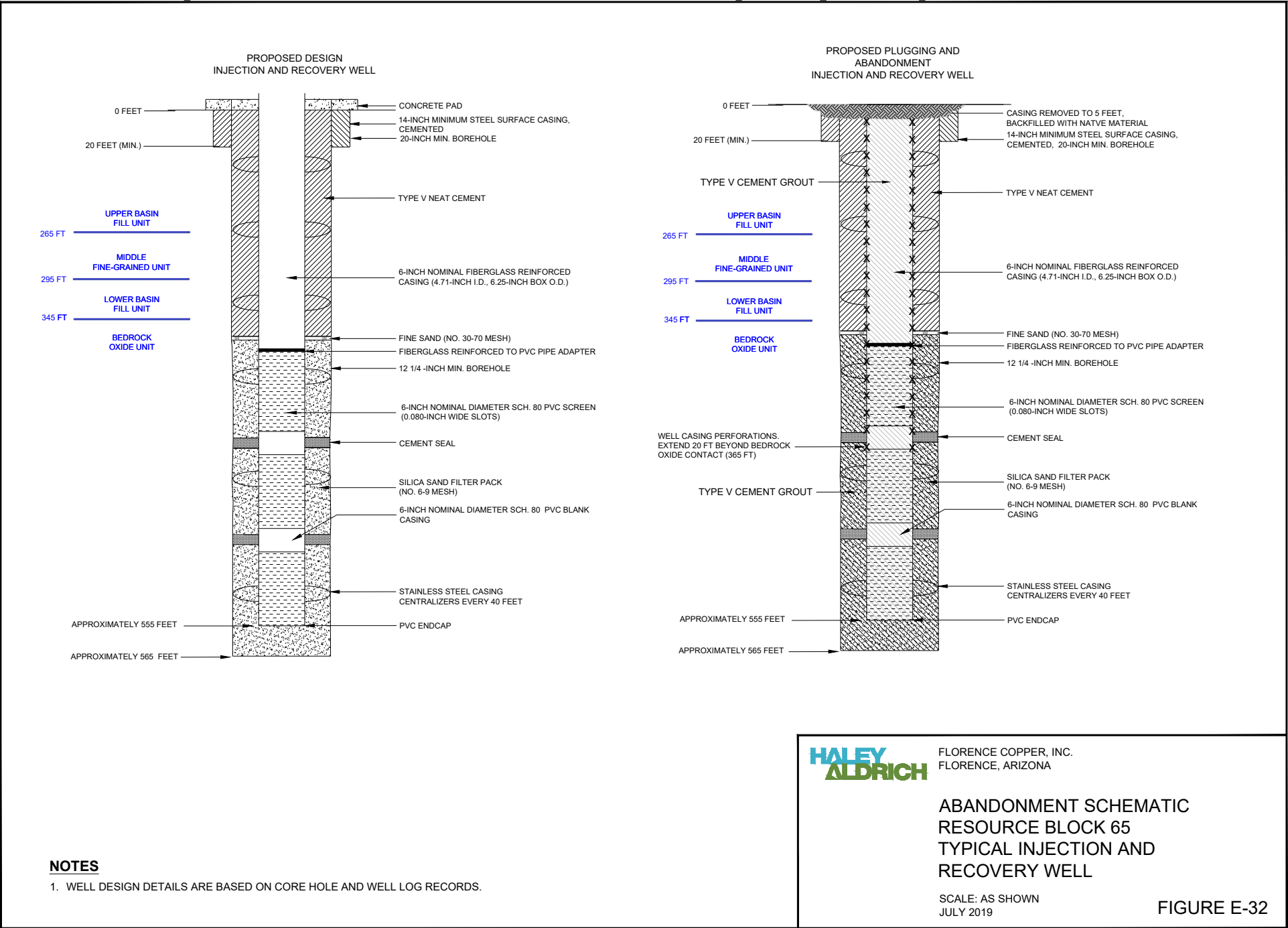


TABLE E-32

WELLS WITHIN RESOURCE BLOCK 65

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
785	849816	745848	65	345	385	555
968	850169	745566	65	345	385	555
971	850099	745566	65	345	385	555
1083	849816	745283	65	345	385	555
1084	849886	745354	65	345	385	555
1085	849886	745283	65	345	385	555
1086	850099	745495	65	345	385	555
1087	850028	745424	65	345	385	555
1088	850028	745495	65	345	385	555
1089	849957	745424	65	345	385	555
1090	849957	745354	65	345	385	555
1494	849674	745424	65	345	385	555
1495	849604	745495	65	345	385	555
1496	849533	745566	65	345	385	555
1497	849816	745424	65	345	385	555
1498	849816	745354	65	345	385	555
1499	849745	745354	65	345	385	555
1586	849745	745495	65	345	385	555
1587	849816	745566	65	345	385	555
1588	849816	745636	65	345	385	555
1589	849745	745566	65	345	385	555
1590	849674	745495	65	345	385	555
1591	849604	745566	65	345	385	555
1592	849674	745636	65	345	385	555
1593	849745	745707	65	345	385	555
1594	849816	745707	65	345	385	555
1595	849745	745636	65	345	385	555
1596	849674	745566	65	345	385	555
1598	849745	745778	65	345	385	555
1599	849674	745707	65	345	385	555
1600	849604	745636	65	345	385	555
1602	849816	745778	65	345	385	555
1603	849745	745424	65	345	385	555
1604	849816	745495	65	345	385	555
1605	849886	745636	65	345	385	555
1606	849886	745424	65	345	385	555
1607	849886	745495	65	345	385	555
1608	849886	745566	65	345	385	555
1609	849887	745706	65	345	385	555

TABLE E-32**WELLS WITHIN RESOURCE BLOCK 65**

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
1610	849886	745778	65	345	385	555
1611	849886	745849	65	345	385	555
1612	849957	745495	65	345	385	555
1613	850028	745566	65	345	385	555
1614	850099	745636	65	345	385	555
1616	849957	745636	65	345	385	555
1617	850028	745707	65	345	385	555
1621	850028	745636	65	345	385	555
1622	849957	745566	65	345	385	555
1623	849957	745778	65	345	385	555
1626	849957	745707	65	345	385	555

Notes:*ft bgs = feet below ground surface*

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 66 Wells - See Attached Table E-33

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.048620

Surface Location

SE 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.426409

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 66. There are 1 Class III multi-use injection/ recovery wells, 1 dedicated Class III observation, and 1 Class III perimeter wells planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out. The dedicated perimeter observation well will have a design and depth similar to the injection and recovery wells, but will not have a segmented well screen.

The work performed includes plugging and abandonment of the Class III wells in resource block 66. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figures E-33a and E-33b.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

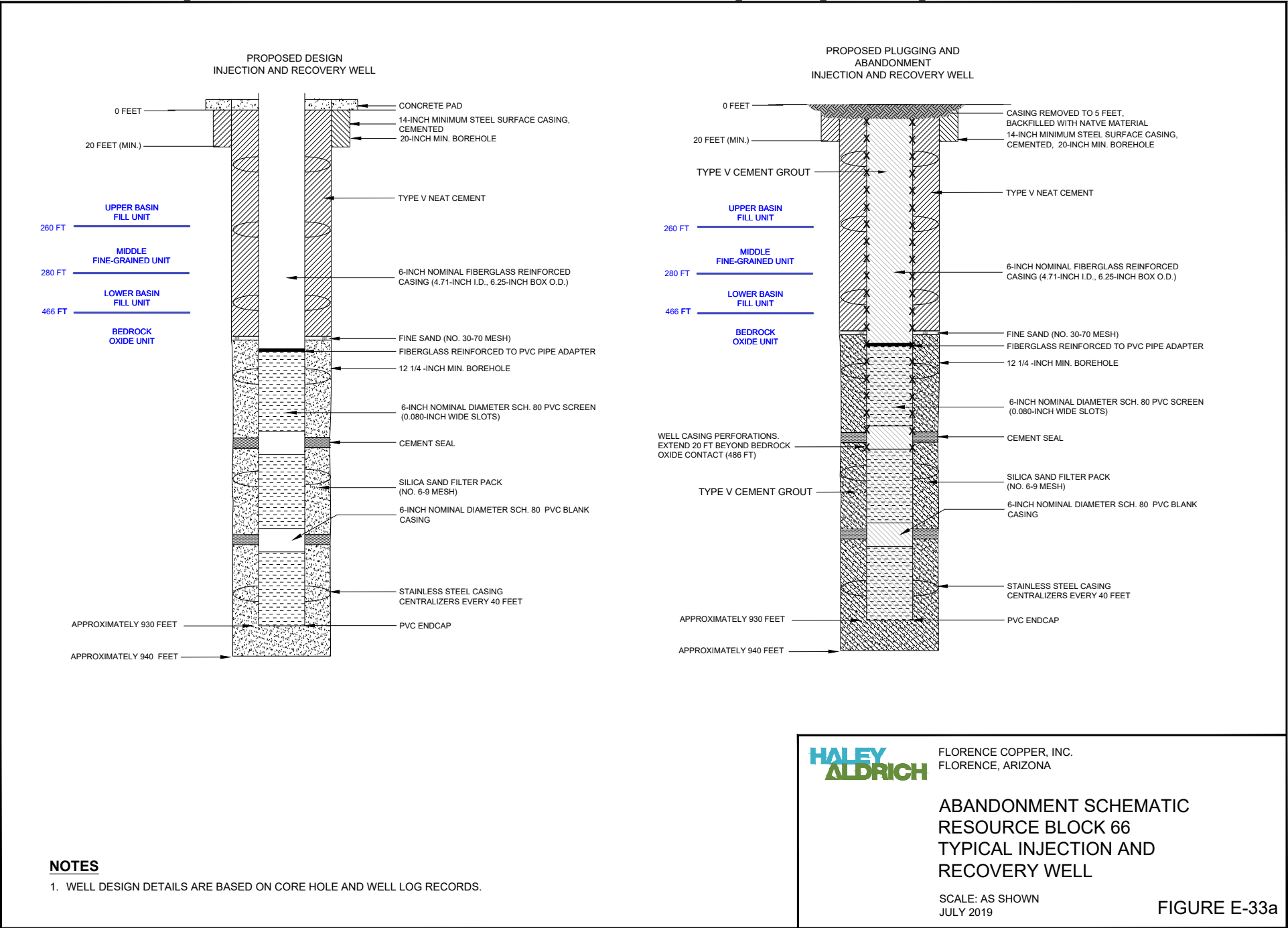
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

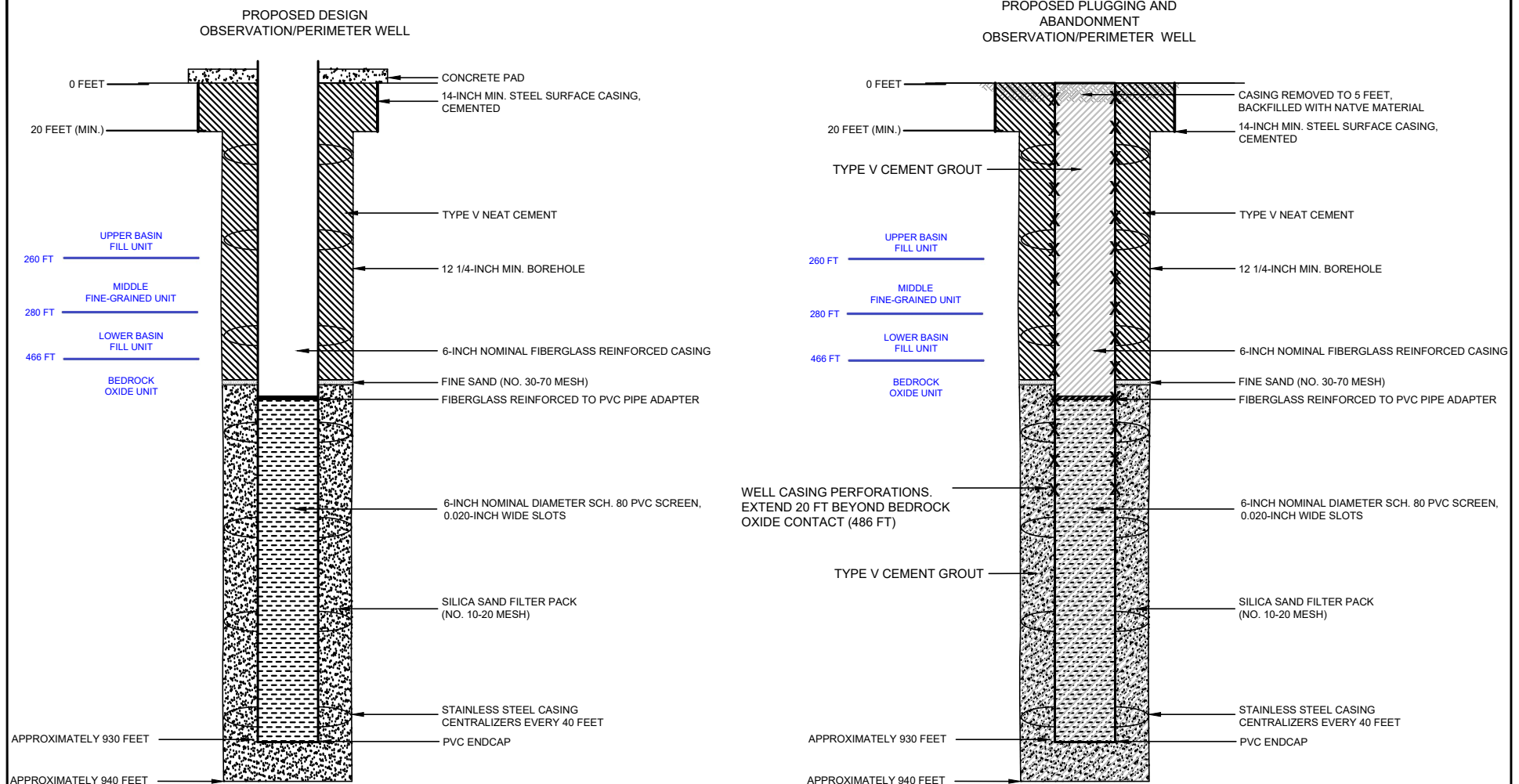
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.





NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 66 OBSERVATION/PERIMETER WELL

JULY 2019
SCALE: AS SHOWN

FIGURE E-33b

TABLE E-33
WELLS WITHIN RESOURCE BLOCK 66
 FLORENCE COPPER PROJECT
 FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
977	850240	745566	66	466	506	930
O18	850381	745636	66	466	506	930
P35	850311	745566	66	466	506	930

Notes:

ft bgs = feet below ground surface

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 70 Wells - See Attached Table E-34

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.047637

Surface Location

SW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.435747

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 70. There are 18 Class III multi-use injection/ recovery wells, and 2 Class III perimeter wells planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out. The dedicated perimeter observation well will have a design and depth similar to the injection and recovery wells, but will not have a segmented well screen.

The work performed includes plugging and abandonment of the Class III wells in resource block 70. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figures E-34a and E-34b.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

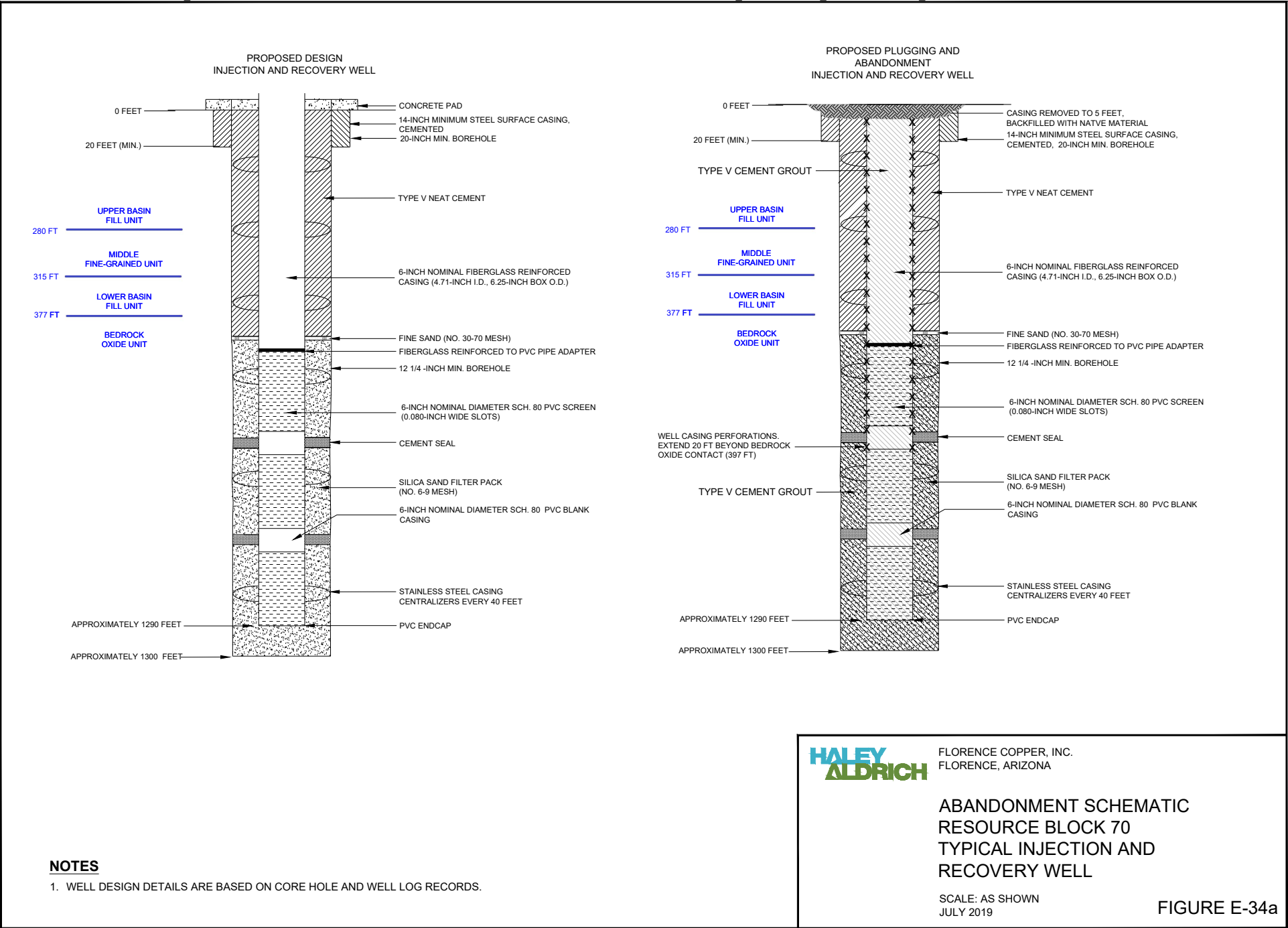
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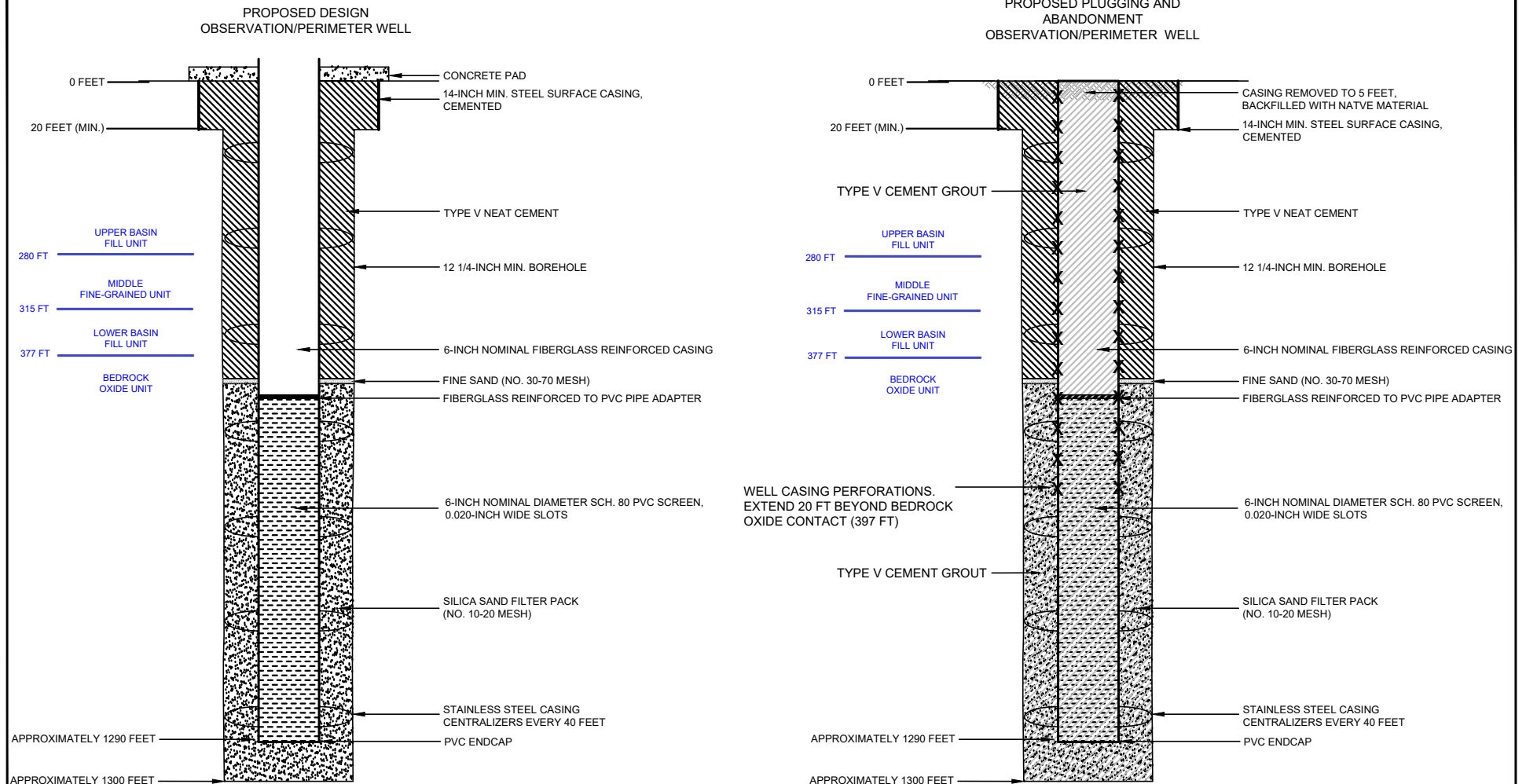
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.





NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 70 OBSERVATION/PERIMETER WELL

JULY 2019
SCALE: AS SHOWN

FIGURE E-34b

TABLE E-34

WELLS WITHIN RESOURCE BLOCK 70

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
1883	847412	744929	70	377	417	1290
1885	847412	745000	70	377	417	1290
1886	847341	744929	70	377	417	1290
2029	847695	745212	70	377	417	1290
2031	847553	745071	70	377	417	1290
2032	847482	745000	70	377	417	1290
2033	847553	745141	70	377	417	1290
2034	847482	745071	70	377	417	1290
2035	847625	745140	70	377	417	1290
2036	847624	745212	70	377	417	1290
2219	847411	745493	70	377	417	1290
2228	847481	745423	70	377	417	1290
2232	847552	745352	70	377	417	1290
2234	847623	745281	70	377	417	1290
2238	847411	745423	70	377	417	1290
2239	847340	745423	70	377	417	1290
2240	847340	745493	70	377	417	1290
2241	847269	745423	70	377	417	1290
2242	847411	745069	70	377	417	1290
2243	847481	745140	70	377	417	1290
2244	847340	745140	70	377	417	1290
2245	847411	745211	70	377	417	1290
2246	847481	745211	70	377	417	1290
2247	847411	745140	70	377	417	1290
2248	847340	745069	70	377	417	1290
2249	847269	745210	70	377	417	1290
2250	847340	745281	70	377	417	1290
2251	847411	745281	70	377	417	1290
2252	847340	745210	70	377	417	1290
2253	847269	745140	70	377	417	1290
2254	847340	745352	70	377	417	1290
2255	847269	745281	70	377	417	1290
2256	847199	745210	70	377	417	1290
2257	847199	745281	70	377	417	1290
2258	847269	745352	70	377	417	1290
2259	847199	745352	70	377	417	1290
2261	847481	745352	70	377	417	1290
2262	847411	745352	70	377	417	1290
2263	847552	745281	70	377	417	1290

TABLE E-34**WELLS WITHIN RESOURCE BLOCK 70**

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
2264	847481	745281	70	377	417	1290
2265	847552	745211	70	377	417	1290
2311	847340	744998	70	377	417	1290
2314	847269	745069	70	377	417	1290
2315	847269	744998	70	377	417	1290
P71	847199	745140	70	377	417	1290
P72	847128	745281	70	377	417	1290

Notes:*ft bgs = feet below ground surface*

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 71 Wells - See Attached Table E-35

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.047609

Surface Location

SE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.433454

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 71. There are 48 Class III multi-use injection/ recovery wells, planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out.

The work performed includes plugging and abandonment of the Class III wells in resource block 71. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figure E-35.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

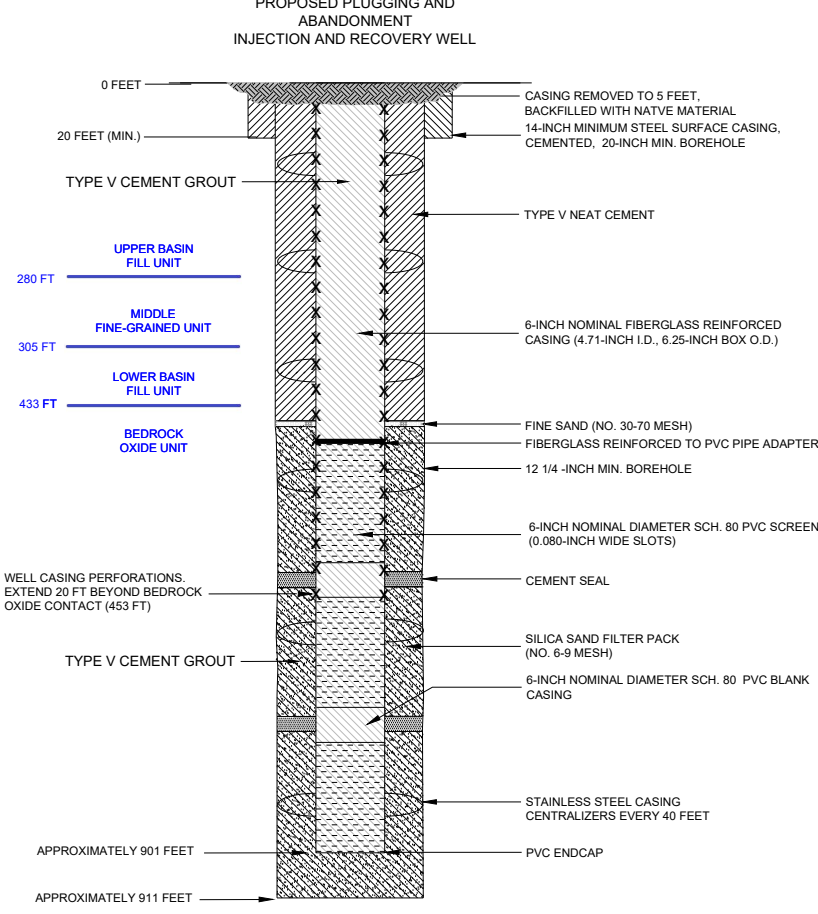
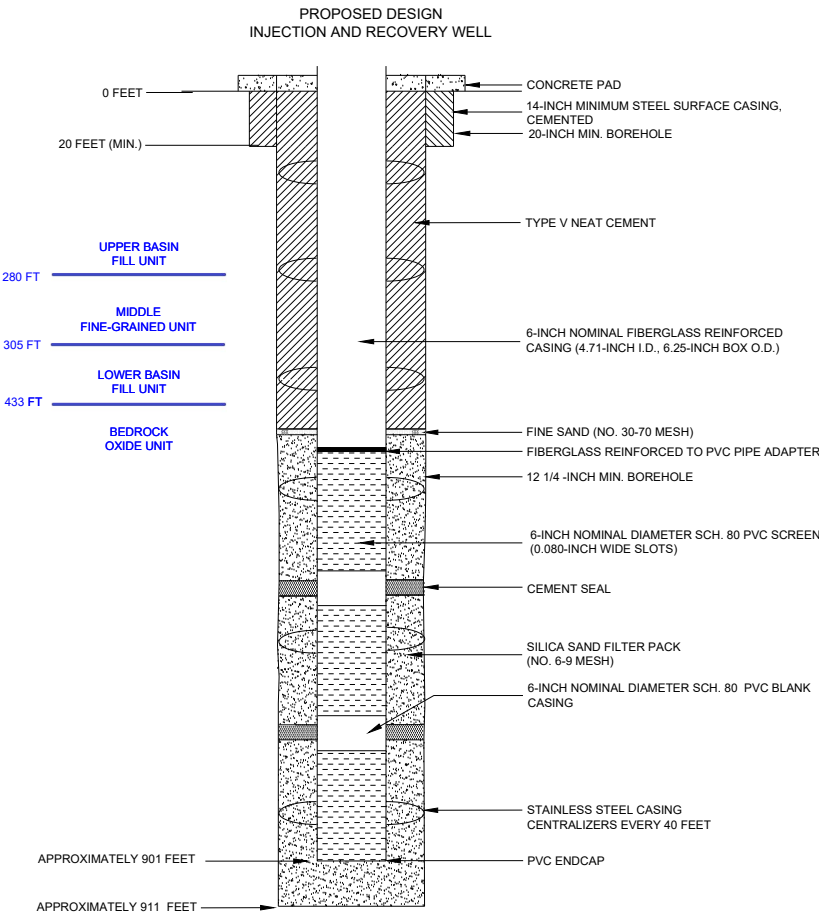
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

**ABANDONMENT SCHEMATIC
RESOURCE BLOCK 71
TYPICAL INJECTION AND
RECOVERY WELL**

SCALE: AS SHOWN
JULY 2019

FIGURE E-35

TABLE E-35

WELLS WITHIN RESOURCE BLOCK 71

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
1642	848189	745000	71	433	473	901
1643	848260	745071	71	433	473	901
1644	848331	745141	71	433	473	901
1645	848402	745212	71	433	473	901
1649	848331	745212	71	433	473	901
1650	848260	745141	71	433	473	901
1651	848189	745071	71	433	473	901
1660	848119	745000	71	433	473	901
1769	848119	744929	71	433	473	901
1770	848048	744929	71	433	473	901
2038	847977	745283	71	433	473	901
2039	847977	745212	71	433	473	901
2040	848119	745071	71	433	473	901
2041	848189	745141	71	433	473	901
2042	848260	745212	71	433	473	901
2043	848331	745283	71	433	473	901
2045	848260	745283	71	433	473	901
2046	848189	745212	71	433	473	901
2047	848119	745141	71	433	473	901
2048	848049	745140	71	433	473	901
2049	848119	745212	71	433	473	901
2050	848048	745212	71	433	473	901
2051	848260	745354	71	433	473	901
2052	848189	745348	71	433	473	901
2053	848189	745283	71	433	473	901
2054	848119	745283	71	433	473	901
2063	847977	745000	71	433	473	901
2064	847977	745071	71	433	473	901
2071	847907	745141	71	433	473	901
2072	847977	745141	71	433	473	901
2073	847907	745071	71	433	473	901
2079	847836	745212	71	433	473	901
2080	847907	745212	71	433	473	901
2081	847836	745141	71	433	473	901
2084	847836	745264	71	433	473	901
2085	847765	745212	71	433	473	901
2089	848048	745071	71	433	473	901
2090	848048	745000	71	433	473	901
2142	847976	745423	71	433	473	901

TABLE E-35

WELLS WITHIN RESOURCE BLOCK 71

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
2169	848047	745423	71	433	473	901
2170	848118	745423	71	433	473	901
2171	848118	745493	71	433	473	901
2172	848047	745493	71	433	473	901
2174	847976	745368	71	433	473	901
2175	847906	745352	71	433	473	901
2176	848047	745381	71	433	473	901
2196	847906	745265	71	433	473	901
2199	848047	745281	71	433	473	901

Notes:*ft bgs = feet below ground surface*

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 72 Wells - See Attached Table E-36

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.047660

Surface Location

SE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.431131

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 72. There are 49 Class III multi-use injection/ recovery wells, planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out.

The work performed includes plugging and abandonment of the Class III wells in resource block 72. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figure E-36.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

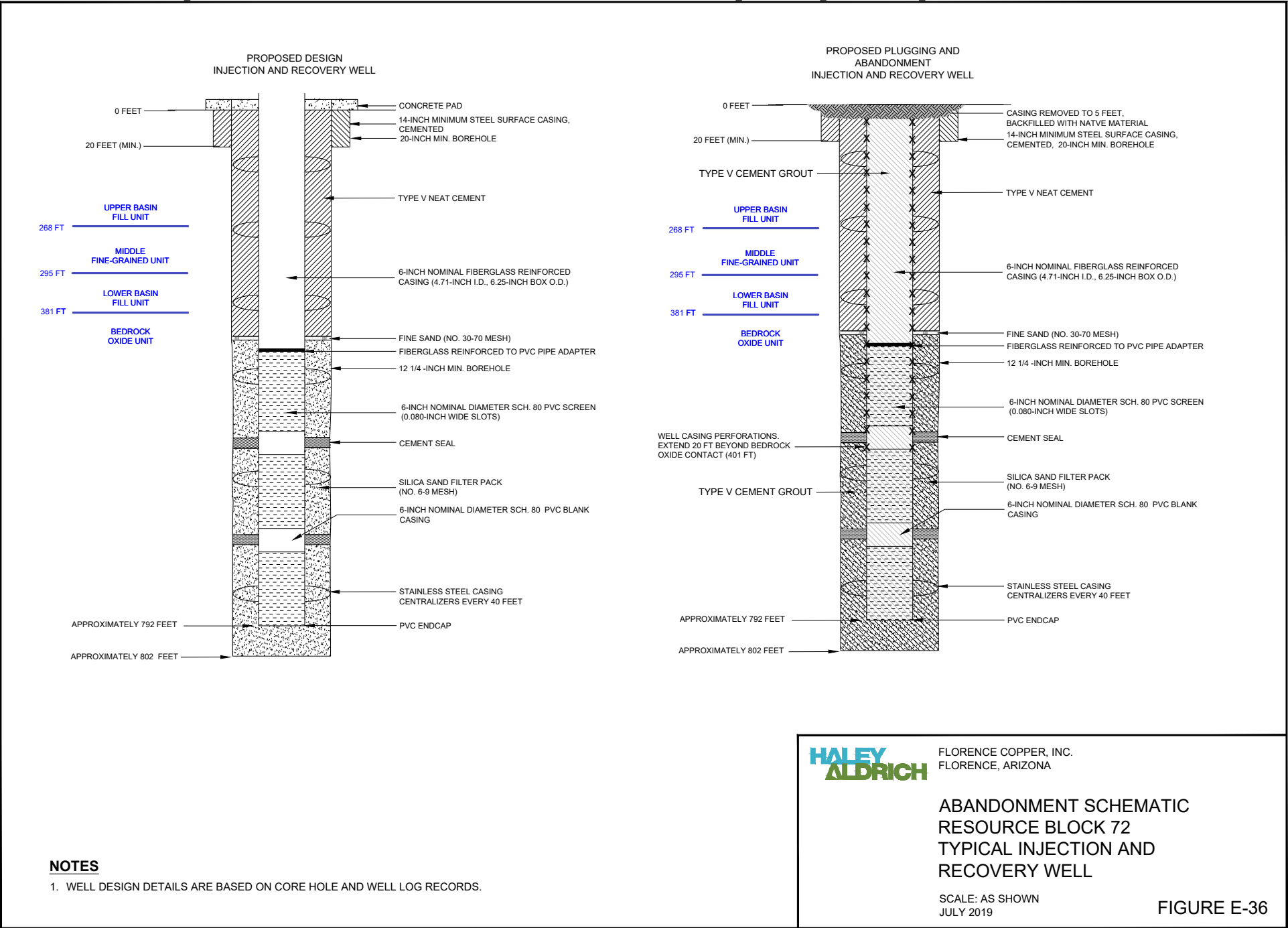


TABLE E-36

WELLS WITHIN RESOURCE BLOCK 72

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
1256	848755	744929	72	381	421	792
1273	848826	744929	72	381	421	792
1274	848897	745000	72	381	421	792
1275	848897	745071	72	381	421	792
1276	848826	745000	72	381	421	792
1486	848967	745071	72	381	421	792
1487	849038	745141	72	381	421	792
1488	849038	745212	72	381	421	792
1489	848967	745141	72	381	421	792
1491	849109	745212	72	381	421	792
1681	848684	745424	72	381	421	792
1682	848755	745424	72	381	421	792
1683	848755	745495	72	381	421	792
1686	848684	745000	72	381	421	792
1687	848684	745071	72	381	421	792
1695	848614	745141	72	381	421	792
1696	848684	745141	72	381	421	792
1697	848614	745071	72	381	421	792
1705	848543	745212	72	381	421	792
1707	848543	745141	72	381	421	792
1712	848543	745283	72	381	421	792
1713	848472	745212	72	381	421	792
1718	848684	745354	72	381	421	792
1719	848614	745354	72	381	421	792
1720	848684	745283	72	381	421	792
1721	848614	745283	72	381	421	792
1722	848684	745212	72	381	421	792
1725	848755	745071	72	381	421	792
1726	848755	745000	72	381	421	792
1727	848756	745141	72	381	421	792
1728	848755	745212	72	381	421	792
1729	848755	745354	72	381	421	792
1730	848755	745283	72	381	421	792
1740	848897	745424	72	381	421	792
1741	848826	745495	72	381	421	792
1745	848826	745424	72	381	421	792
1750	848826	745071	72	381	421	792
1751	848897	745141	72	381	421	792
1752	848967	745212	72	381	421	792

TABLE E-36

WELLS WITHIN RESOURCE BLOCK 72

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
1753	848826	745212	72	381	421	792
1754	848897	745283	72	381	421	792
1755	848967	745283	72	381	421	792
1756	848897	745212	72	381	421	792
1757	848826	745141	72	381	421	792
1758	848897	745353	72	381	421	792
1759	848826	745283	72	381	421	792
1760	848826	745353	72	381	421	792
1763	848967	745353	72	381	421	792
1764	849038	745283	72	381	421	792

Notes:*ft bgs = feet below ground surface*

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 73 Wells - See Attached Table E-37

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.047604

Surface Location

SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.428879

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 73. There are 50 Class III multi-use injection/ recovery wells, planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out.

The work performed includes plugging and abandonment of the Class III wells in resource block 73. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figure E-37.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

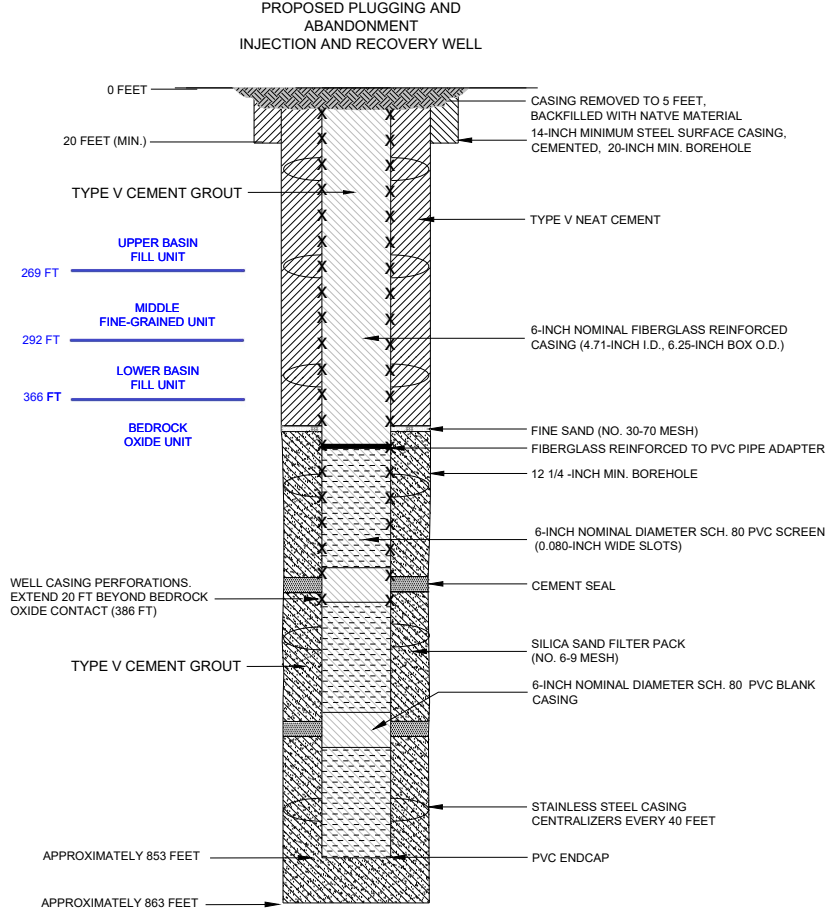
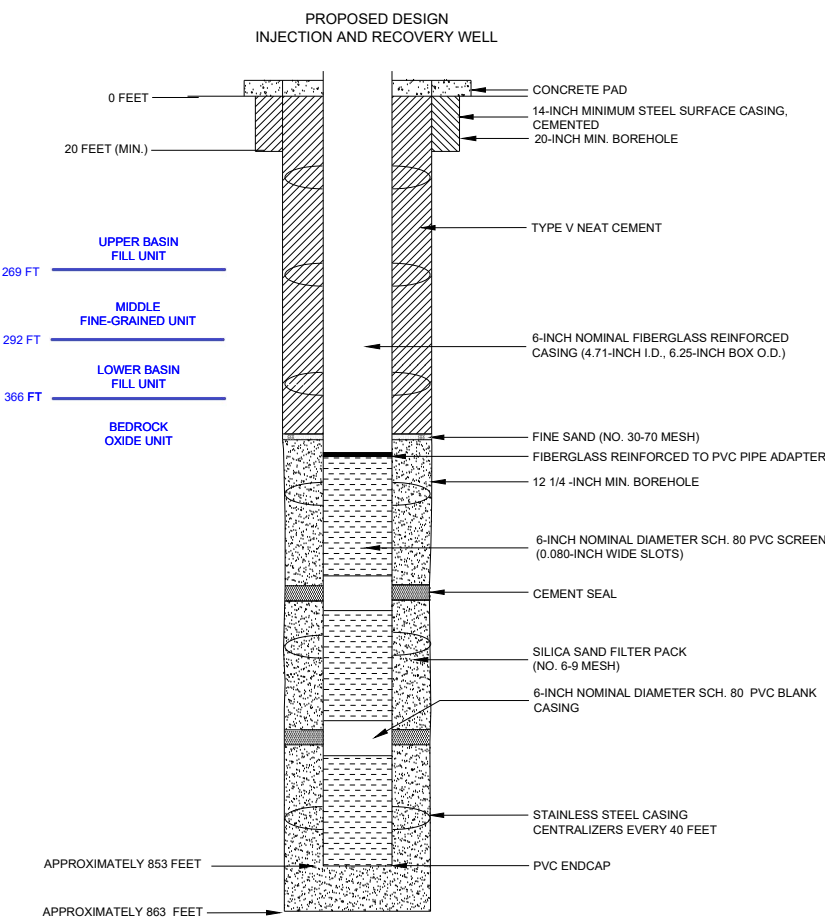
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

**ABANDONMENT SCHEMATIC
RESOURCE BLOCK 73
TYPICAL INJECTION AND
RECOVERY WELL**

SCALE: AS SHOWN
JULY 2019

FIGURE E-37

TABLE E-37

WELLS WITHIN RESOURCE BLOCK 73

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
1091	849816	745212	73	366	406	853
1100	849533	744929	73	366	406	853
1101	849604	745000	73	366	406	853
1102	849674	745071	73	366	406	853
1103	849745	745141	73	366	406	853
1109	849745	745212	73	366	406	853
1110	849674	745141	73	366	406	853
1111	849604	745071	73	366	406	853
1112	849533	745000	73	366	406	853
1113	849462	744929	73	366	406	853
1500	849604	745424	73	366	406	853
1501	849533	745495	73	366	406	853
1502	849674	745353	73	366	406	853
1503	849745	745283	73	366	406	853
1504	849462	745424	73	366	406	853
1505	849533	745424	73	366	406	853
1506	849462	745495	73	366	406	853
1507	849392	745424	73	366	406	853
1515	849462	745000	73	366	406	853
1516	849533	745071	73	366	406	853
1517	849604	745141	73	366	406	853
1518	849674	745212	73	366	406	853
1520	849391	745071	73	366	406	853
1521	849462	745141	73	366	406	853
1522	849533	745212	73	366	406	853
1523	849604	745283	73	366	406	853
1524	849674	745283	73	366	406	853
1525	849604	745212	73	366	406	853
1526	849533	745141	73	366	406	853
1527	849462	745071	73	366	406	853
1528	849391	745000	73	366	406	853
1530	849604	745354	73	366	406	853
1531	849533	745283	73	366	406	853
1532	849462	745212	73	366	406	853
1533	849391	745141	73	366	406	853
1534	849321	745071	73	366	406	853
1537	849321	745141	73	366	406	853
1538	849391	745212	73	366	406	853
1539	849462	745283	73	366	406	853

TABLE E-37**WELLS WITHIN RESOURCE BLOCK 73**

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
1540	849533	745354	73	366	406	853
1541	849462	745354	73	366	406	853
1542	849391	745283	73	366	406	853
1543	849321	745212	73	366	406	853
1544	849250	745141	73	366	406	853
1553	849250	745212	73	366	406	853
1554	849179	745212	73	366	406	853
1555	849391	745354	73	366	406	853
1556	849321	745353	73	366	406	853
1557	849321	745283	73	366	406	853
1558	849250	745283	73	366	406	853

Notes:*ft bgs = feet below ground surface*

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 74 Wells - See Attached Table E-38

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.047906

Surface Location

SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.427022

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 74. There are 18 Class III multi-use injection/ recovery wells, 2 dedicated Class III observation, and 4 Class III perimeter wells planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out. The dedicated perimeter observation well will have a design and depth similar to the injection and recovery wells, but will not have a segmented well screen.

The work performed includes plugging and abandonment of the Class III wells in resource block 74. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figures E-38a and E-38b.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

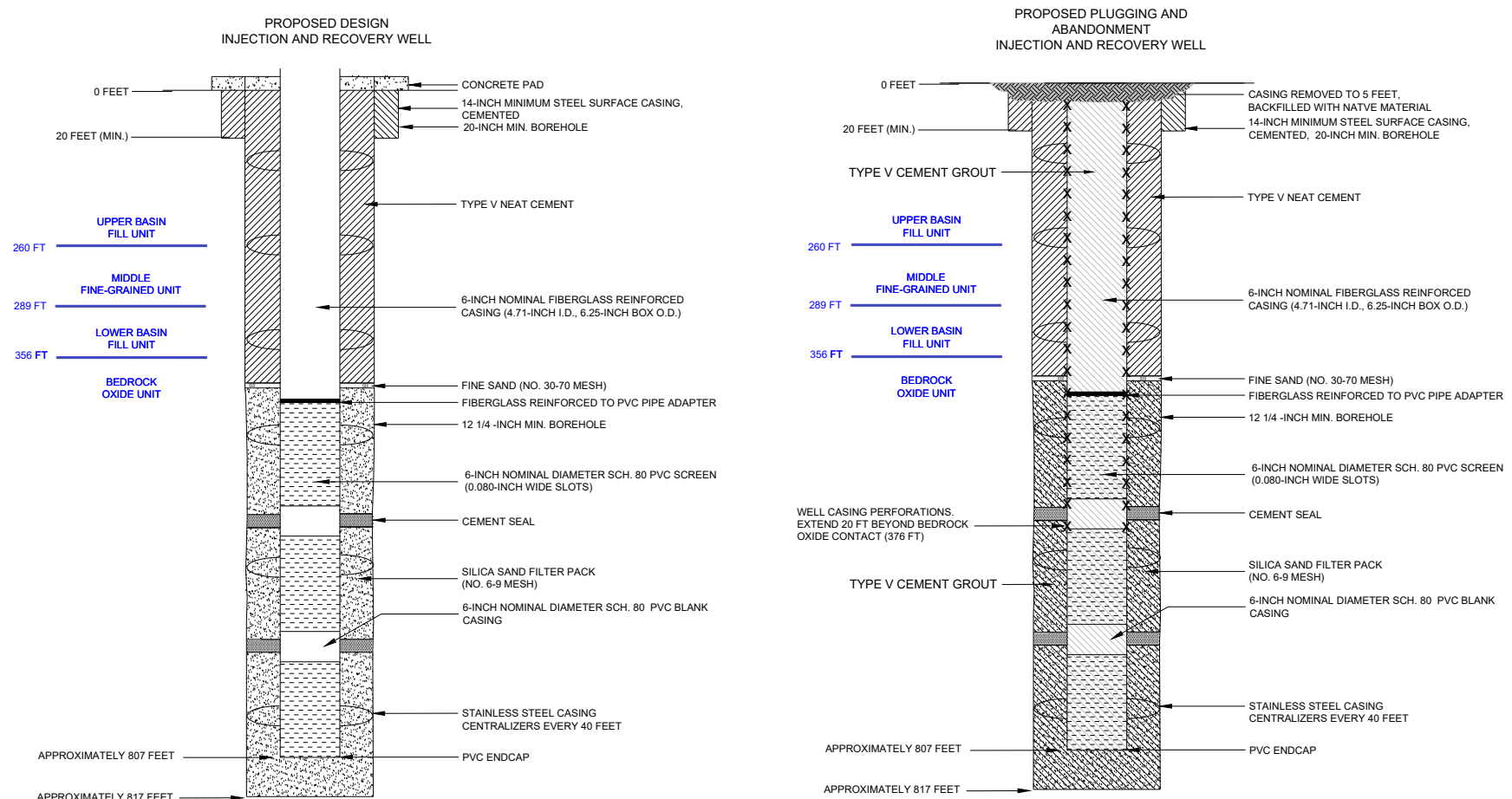
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

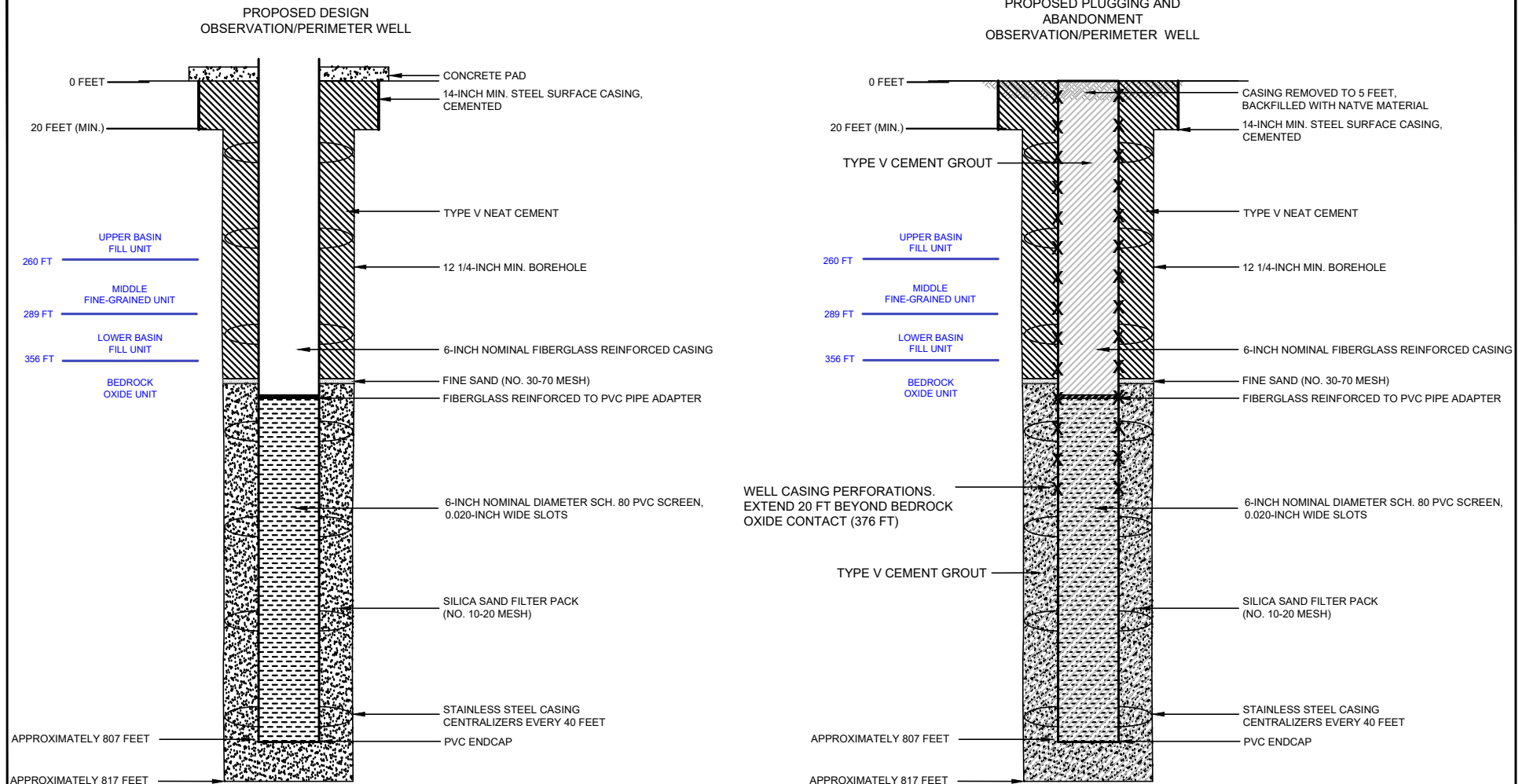


FLORENCE COPPER, INC.
FLORENCE, ARIZONA

**ABANDONMENT SCHEMATIC
RESOURCE BLOCK 74
TYPICAL INJECTION AND
RECOVERY WELL**

SCALE: AS SHOWN
JULY 2019

FIGURE E-38a



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.



FLORENCE COPPER, INC.
 FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 74 OBSERVATION/PERIMETER WELL

JULY 2019
 SCALE: AS SHOWN

FIGURE E-38b

TABLE E-38
WELLS WITHIN RESOURCE BLOCK 74
 FLORENCE COPPER PROJECT
 FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
976	850169	745495	74	356	396	807
978	850240	745424	74	356	396	807
979	850240	745495	74	356	396	807
1122	849886	745212	74	356	396	807
1185	850099	745424	74	356	396	807
1186	850169	745424	74	356	396	807
1193	850028	745141	74	356	396	807
1199	849957	745212	74	356	396	807
1200	850028	745283	74	356	396	807
1201	850099	745283	74	356	396	807
1202	850028	745212	74	356	396	807
1203	849957	745141	74	356	396	807
1204	850028	745354	74	356	396	807
1205	849957	745283	74	356	396	807
1206	850240	745354	74	356	396	807
1207	850169	745354	74	356	396	807
1208	850099	745354	74	356	396	807
1210	850169	745283	74	356	396	807
O19	850311	745354	74	356	396	807
O20	850169	745141	74	356	396	807
P36	850311	745424	74	356	396	807
P37	850240	745283	74	356	396	807
P38	850169	745212	74	356	396	807
P39	850099	745141	74	356	396	807

Notes:

ft bgs = feet below ground surface

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 78 Wells - See Attached Table E-39

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.046722

Surface Location

SW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.436024

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 78. There are 4 Class III multi-use injection/ recovery wells, 2 dedicated Class III observation, and 3 Class III perimeter wells planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out. The dedicated perimeter observation well will have a design and depth similar to the injection and recovery wells, but will not have a segmented well screen.

The work performed includes plugging and abandonment of the Class III wells in resource block 78. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figures E-39a and E-39b.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

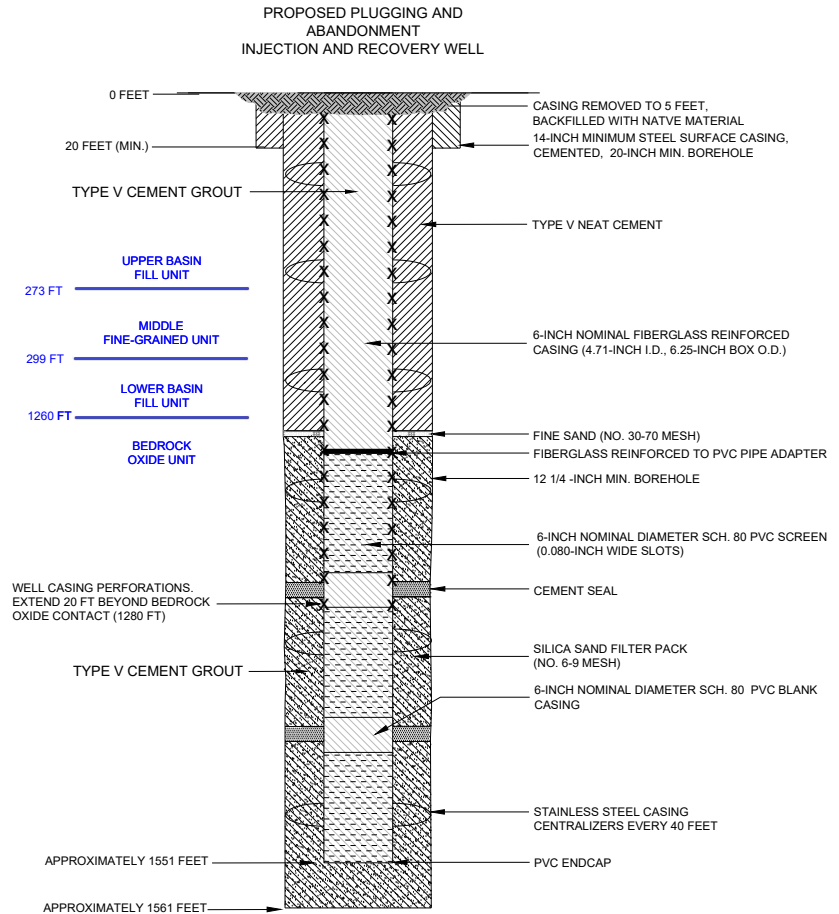
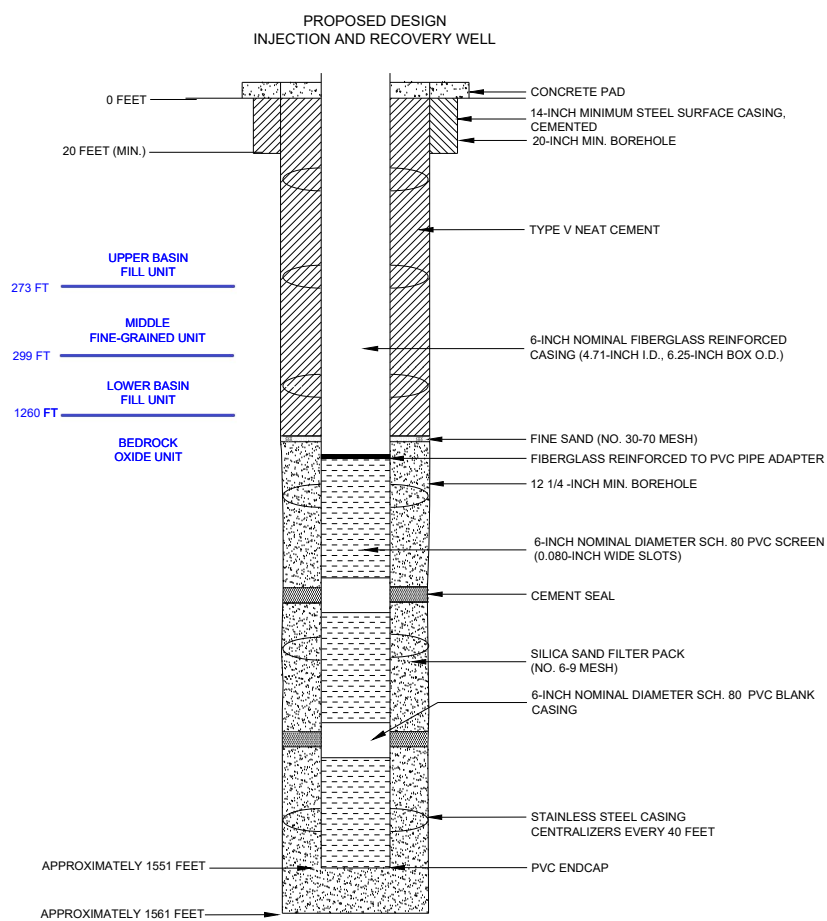
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

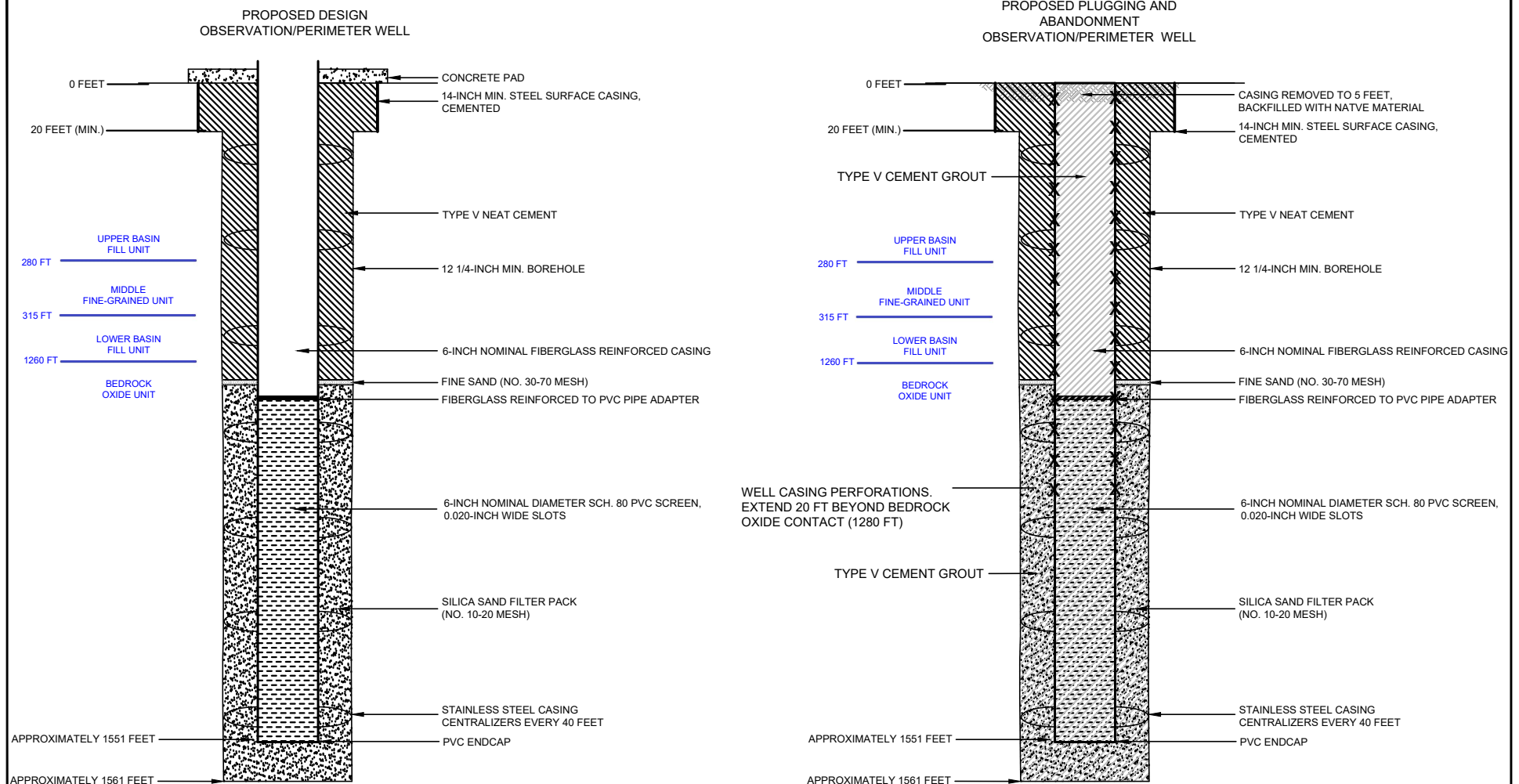


FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 78 TYPICAL INJECTION AND RECOVERY WELL

SCALE: AS SHOWN
JULY 2019

FIGURE E-39a



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 78 OBSERVATION/PERIMETER WELL

JULY 2019
SCALE: AS SHOWN

FIGURE E-39b

TABLE E-39
WELLS WITHIN RESOURCE BLOCK 78
 FLORENCE COPPER PROJECT
 FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
1884	847341	744858	78	1260	1300	1551
1887	847270	744858	78	1260	1300	1551
1893	847270	744788	78	1260	1300	1551
2310	847269	744928	78	1260	1300	1551
O35	847129	744788	78	1260	1300	1551
O36	847128	745069	78	1260	1300	1551
P68	847200	744717	78	1260	1300	1551
P69	847200	744858	78	1260	1300	1551
P70	847199	744998	78	1260	1300	1551

Notes:

ft bgs = feet below ground surface

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 79 Wells - See Attached Table E-40

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.046624

Surface Location

SE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.434579

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 79. There are 50 Class III multi-use injection/ recovery wells, planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out.

The work performed includes plugging and abandonment of the Class III wells in resource block 79. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figure E-40.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

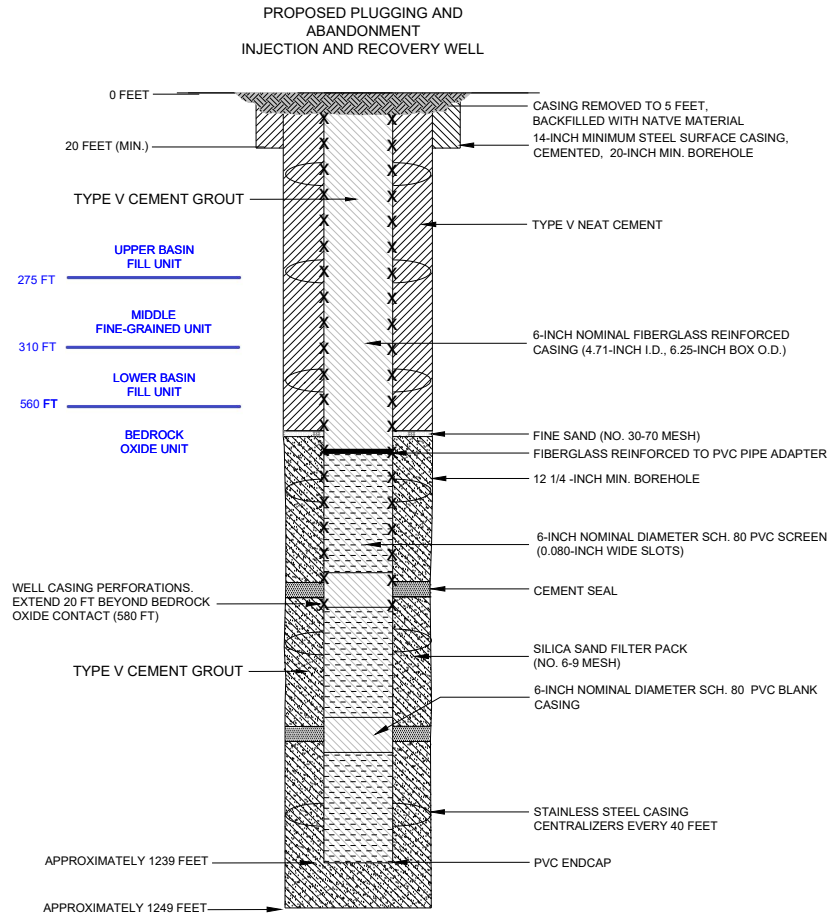
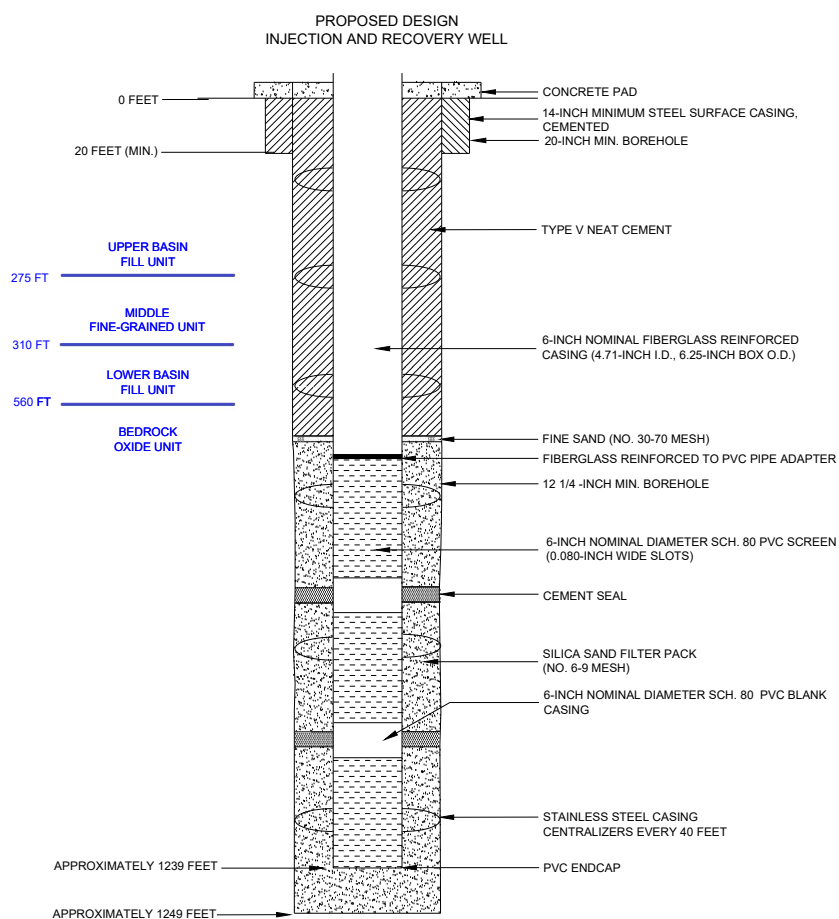
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 79 TYPICAL INJECTION AND RECOVERY WELL

SCALE: AS SHOWN
JULY 2019

FIGURE E-40

TABLE E-40

WELLS WITHIN RESOURCE BLOCK 79

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
1767	847977	744859	79	560	600	1239
1768	848048	744859	79	560	600	1239
1772	847765	744576	79	560	600	1239
1773	847836	744647	79	560	600	1239
1774	847836	744717	79	560	600	1239
1775	847765	744647	79	560	600	1239
1776	847694	744576	79	560	600	1239
1777	847977	744788	79	560	600	1239
1778	847906	744788	79	560	600	1239
1779	847906	744717	79	560	600	1239
1900	847412	744858	79	560	600	1239
1901	847482	744929	79	560	600	1239
1902	847553	744859	79	560	600	1239
1903	847482	744859	79	560	600	1239
1912	847553	744788	79	560	600	1239
1913	847482	744788	79	560	600	1239
1915	847553	744717	79	560	600	1239
1919	847624	744646	79	560	600	1239
1920	847624	744788	79	560	600	1239
1921	847624	744717	79	560	600	1239
1922	847694	744646	79	560	600	1239
1923	847694	744717	79	560	600	1239
2055	847553	745000	79	560	600	1239
2056	847553	744929	79	560	600	1239
2057	847624	745071	79	560	600	1239
2058	847624	744859	79	560	600	1239
2059	847624	744929	79	560	600	1239
2060	847624	745000	79	560	600	1239
2061	847836	744859	79	560	600	1239
2062	847907	744929	79	560	600	1239
2065	847907	745000	79	560	600	1239
2066	847836	744929	79	560	600	1239
2067	847765	744859	79	560	600	1239
2068	847695	744929	79	560	600	1239
2069	847765	745000	79	560	600	1239
2070	847836	745071	79	560	600	1239
2074	847836	745000	79	560	600	1239
2075	847765	744929	79	560	600	1239
2076	847694	744859	79	560	600	1239

TABLE E-40**WELLS WITHIN RESOURCE BLOCK 79**

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
2077	847695	745071	79	560	600	1239
2078	847765	745141	79	560	600	1239
2082	847765	745071	79	560	600	1239
2083	847695	745000	79	560	600	1239
2086	847695	745141	79	560	600	1239
2087	847907	744859	79	560	600	1239
2088	847977	744929	79	560	600	1239
2091	847765	744717	79	560	600	1239
2092	847765	744788	79	560	600	1239
2093	847694	744788	79	560	600	1239
2094	847836	744788	79	560	600	1239

Notes:*ft bgs = feet below ground surface*

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 80 Wells - See Attached Table E-41

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.046674

Surface Location

SE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.432298

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 80. There are 50 Class III multi-use injection/ recovery wells, planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out.

The work performed includes plugging and abandonment of the Class III wells in resource block 80. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figure E-41.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

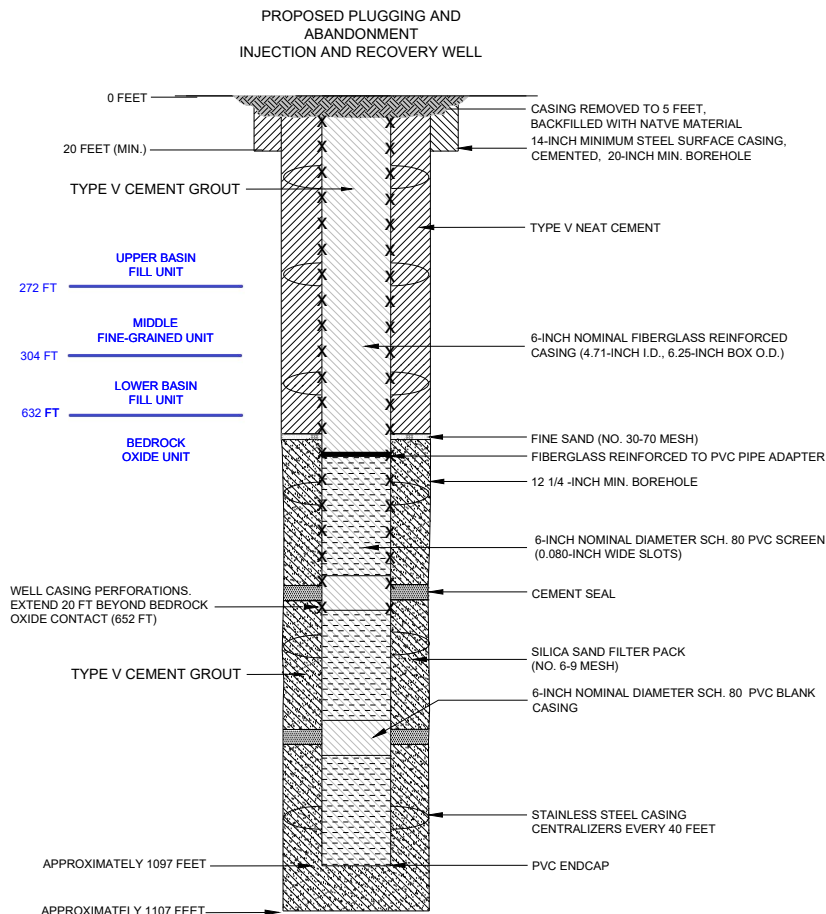
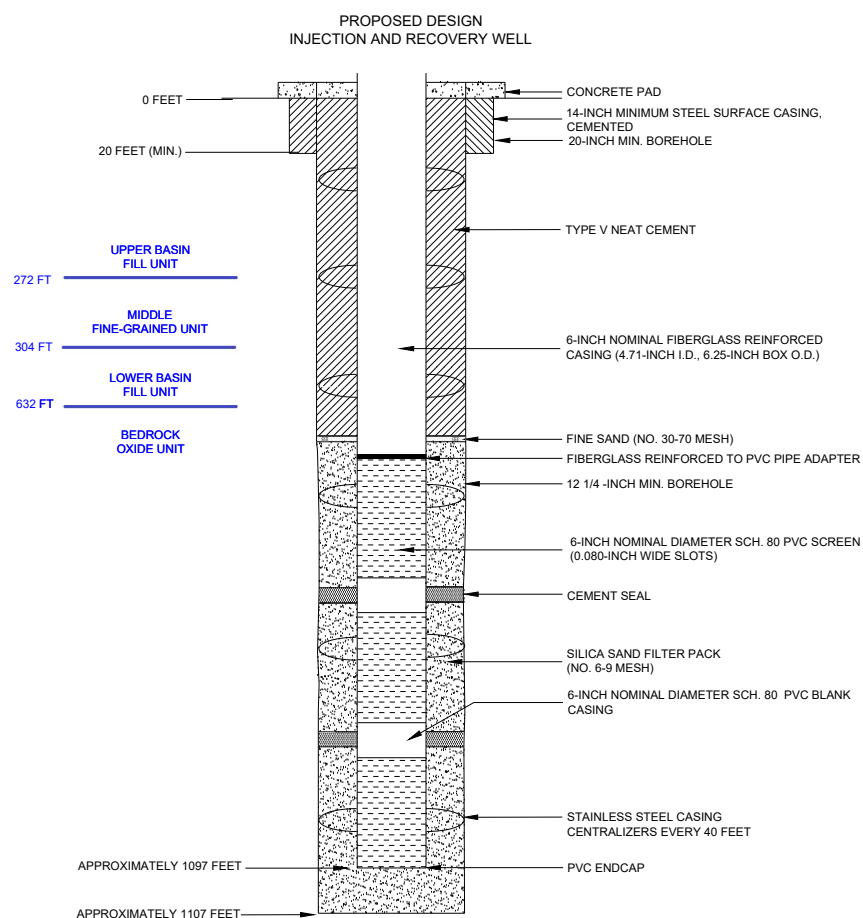
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 80 TYPICAL INJECTION AND RECOVERY WELL

SCALE: AS SHOWN
JULY 2019

FIGURE E-41

TABLE E-41

WELLS WITHIN RESOURCE BLOCK 80

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
1254	848684	744859	80	380	420	1097
1255	848755	744859	80	632	672	1097
1260	848472	744576	80	632	672	1097
1261	848543	744646	80	632	672	1097
1262	848543	744717	80	632	672	1097
1263	848472	744646	80	632	672	1097
1264	848402	744576	80	632	672	1097
1270	848684	744788	80	632	672	1097
1271	848614	744788	80	632	672	1097
1272	848614	744717	80	632	672	1097
1684	848543	744859	80	632	672	1097
1685	848614	744929	80	632	672	1097
1688	848614	745000	80	632	672	1097
1689	848543	744929	80	632	672	1097
1690	848472	744859	80	632	672	1097
1691	848331	744859	80	632	672	1097
1692	848402	744929	80	632	672	1097
1693	848472	745000	80	632	672	1097
1694	848543	745071	80	632	672	1097
1698	848543	745000	80	632	672	1097
1699	848472	744929	80	632	672	1097
1700	848402	744859	80	632	672	1097
1701	848260	744929	80	632	672	1097
1702	848331	745000	80	632	672	1097
1703	848402	745071	80	632	672	1097
1704	848472	745141	80	632	672	1097
1708	848472	745071	80	632	672	1097
1709	848402	745000	80	632	672	1097
1710	848331	744929	80	632	672	1097
1711	848260	744859	80	632	672	1097
1714	848402	745141	80	632	672	1097
1715	848331	745071	80	632	672	1097
1716	848260	745000	80	632	672	1097
1717	848189	744929	80	632	672	1097
1723	848614	744859	80	632	672	1097
1724	848684	744929	80	632	672	1097
1731	848472	744717	80	632	672	1097
1732	848472	744788	80	632	672	1097
1733	848402	744717	80	632	672	1097

TABLE E-41
WELLS WITHIN RESOURCE BLOCK 80
 FLORENCE COPPER PROJECT
 FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
1734	848402	744788	80	632	672	1097
1735	848331	744788	80	632	672	1097
1736	848543	744788	80	632	672	1097
1787	848189	744859	80	632	672	1097
1788	848119	744859	80	632	672	1097
1804	848401	744647	80	632	672	1097
1805	848331	744647	80	632	672	1097
1812	848331	744717	80	632	672	1097
1813	848260	744717	80	632	672	1097
1824	848260	744788	80	632	672	1097
1825	848189	744788	80	632	672	1097

Notes:

ft bgs = feet below ground surface

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 81 Wells - See Attached Table E-42

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.046665

Surface Location

SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.429989

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 81. There are 51 Class III multi-use injection/ recovery wells, planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out.

The work performed includes plugging and abandonment of the Class III wells in resource block 81. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figure E-42.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

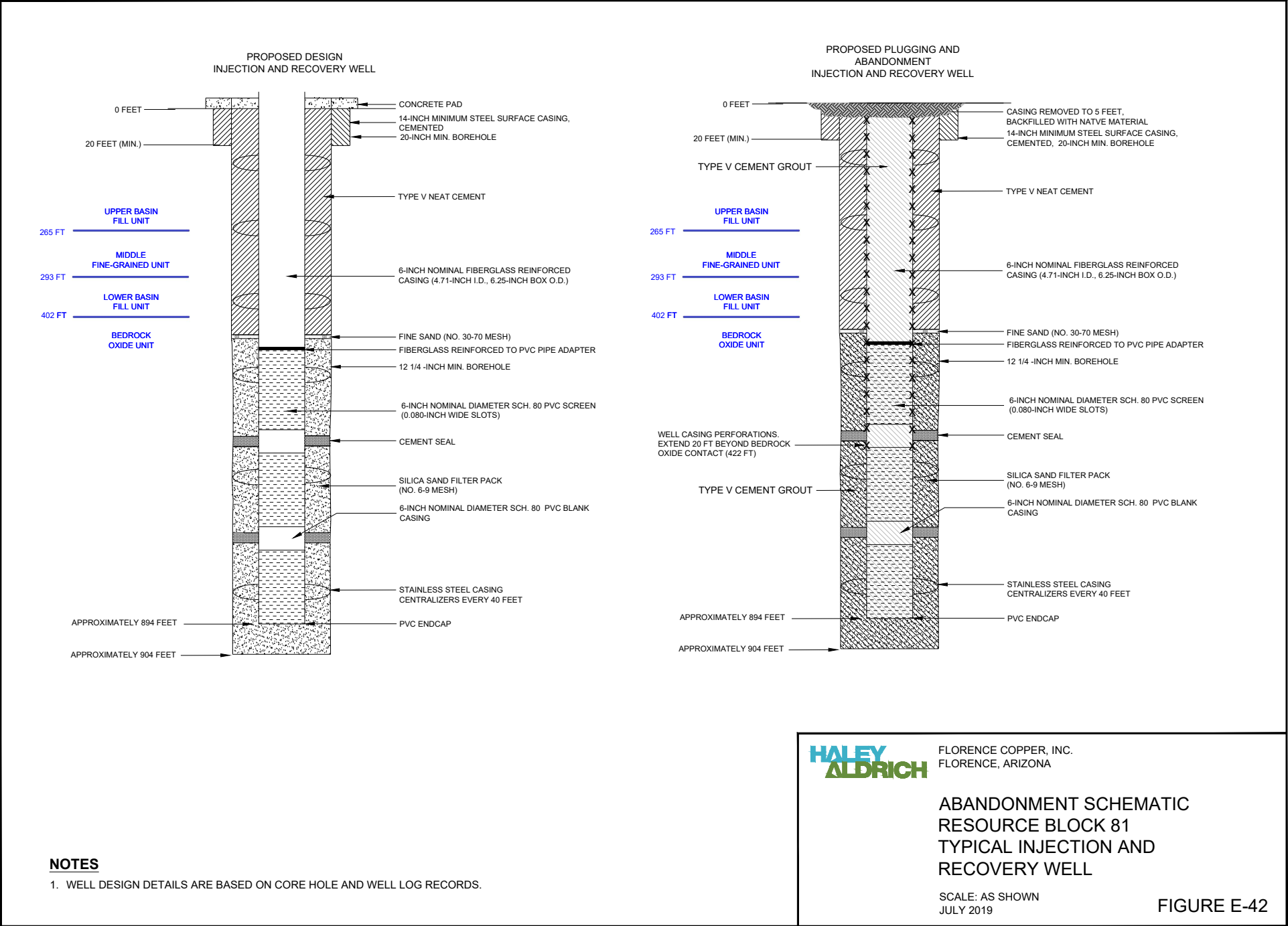


TABLE E-42

WELLS WITHIN RESOURCE BLOCK 81

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
1099	849462	744859	81	402	442	894
1114	849391	744859	81	402	442	894
1123	849109	744576	81	402	442	894
1170	849180	744575	81	402	442	894
1171	849250	744646	81	402	442	894
1172	849179	744646	81	402	442	894
1173	849391	744788	81	402	442	894
1174	849321	744788	81	402	442	894
1175	849321	744717	81	402	442	894
1176	849250	744717	81	402	442	894
1363	848967	744859	81	402	442	894
1364	849038	744929	81	402	442	894
1365	848967	744929	81	402	442	894
1366	848897	744859	81	402	442	894
1367	848967	745000	81	402	442	894
1368	848897	744929	81	402	442	894
1369	848826	744859	81	402	442	894
1370	849109	744859	81	402	442	894
1371	849038	744859	81	402	442	894
1389	849038	744646	81	402	442	894
1395	848967	744717	81	402	442	894
1398	848896	744788	81	402	442	894
1401	849109	744788	81	402	442	894
1402	849038	744788	81	402	442	894
1403	848967	744788	81	402	442	894
1404	849109	744717	81	402	442	894
1405	849038	744717	81	402	442	894
1406	849109	744646	81	402	442	894
1416	849179	744788	81	402	442	894
1417	849179	744717	81	402	442	894
1508	849109	745000	81	402	442	894
1509	849109	745071	81	402	442	894
1510	849038	745000	81	402	442	894
1511	849109	745141	81	402	442	894
1512	849038	745071	81	402	442	894
1513	849109	744929	81	402	442	894
1514	849391	744929	81	402	442	894
1519	849321	745000	81	402	442	894
1529	849321	744929	81	402	442	894

TABLE E-42**WELLS WITHIN RESOURCE BLOCK 81**

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
1535	849250	745000	81	402	442	894
1536	849250	745071	81	402	442	894
1545	849179	745071	81	402	442	894
1546	849321	744859	81	402	442	894
1547	849179	744859	81	402	442	894
1548	849250	744859	81	402	442	894
1549	849250	744929	81	402	442	894
1550	849179	744929	81	402	442	894
1551	849179	745000	81	402	442	894
1552	849180	745140	81	402	442	894
1559	849250	744788	81	402	442	894
1706	848614	745212	81	402	442	894

Notes:*ft bgs = feet below ground surface*

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 82 Wells - See Attached Table E-43

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.046682

Surface Location

SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.427992

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 82. There are 31 Class III multi-use injection/ recovery wells, 2 dedicated Class III observation, and 3 Class III perimeter wells planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out. The dedicated perimeter observation well will have a design and depth similar to the injection and recovery wells, but will not have a segmented well screen.

The work performed includes plugging and abandonment of the Class III wells in resource block 82. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figures E-43a and E-43b.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

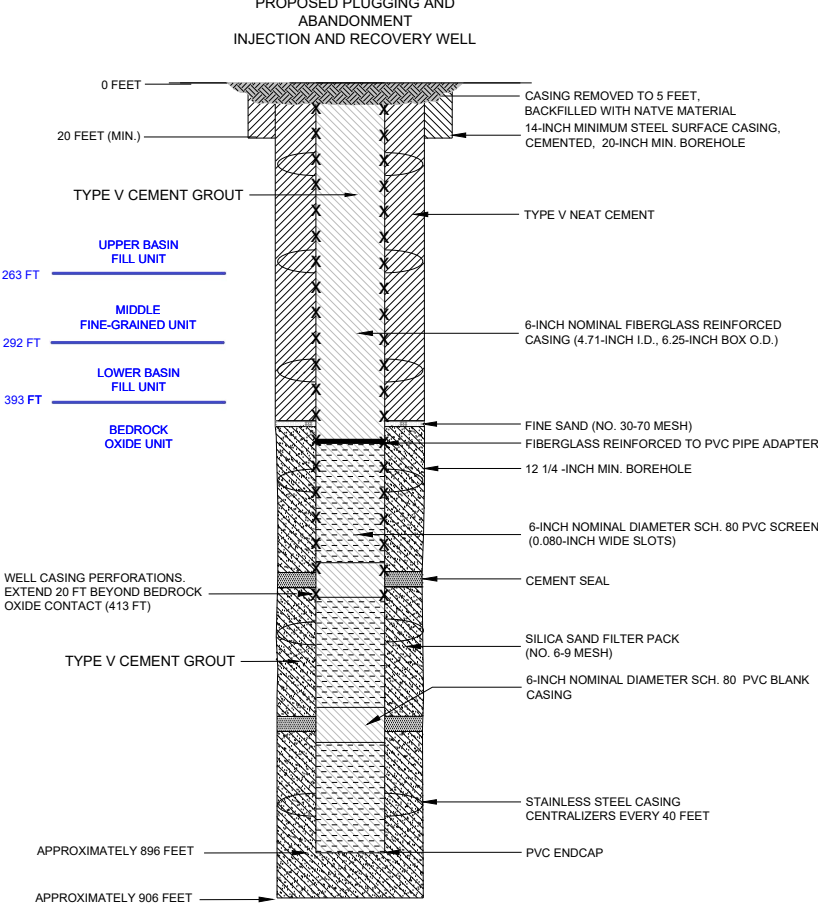
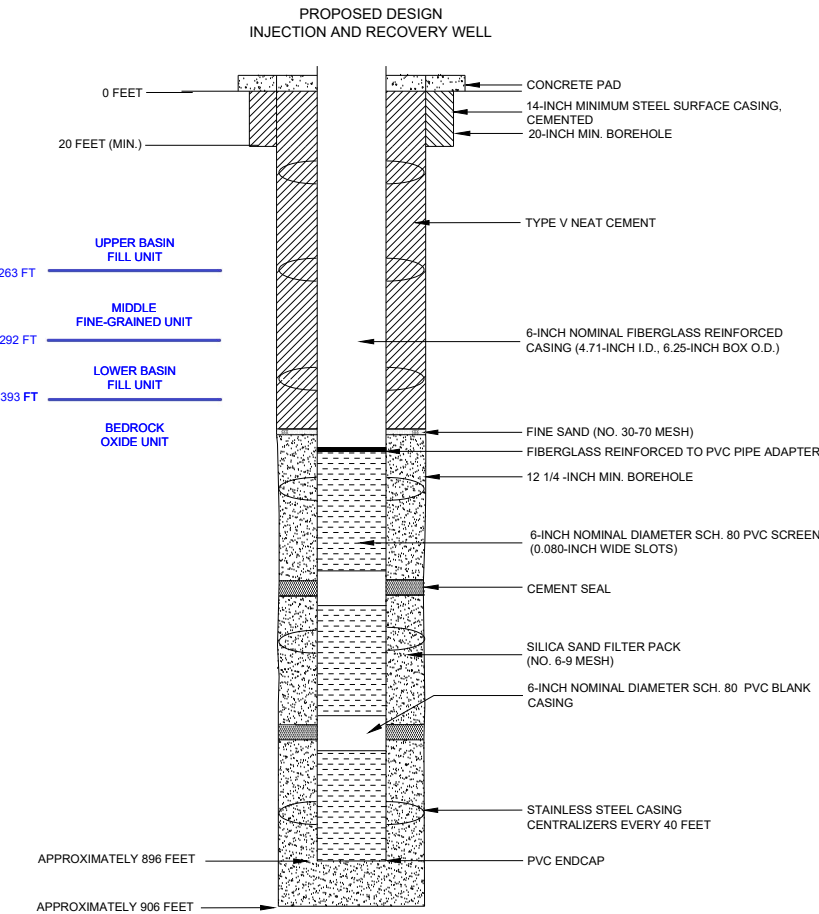
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

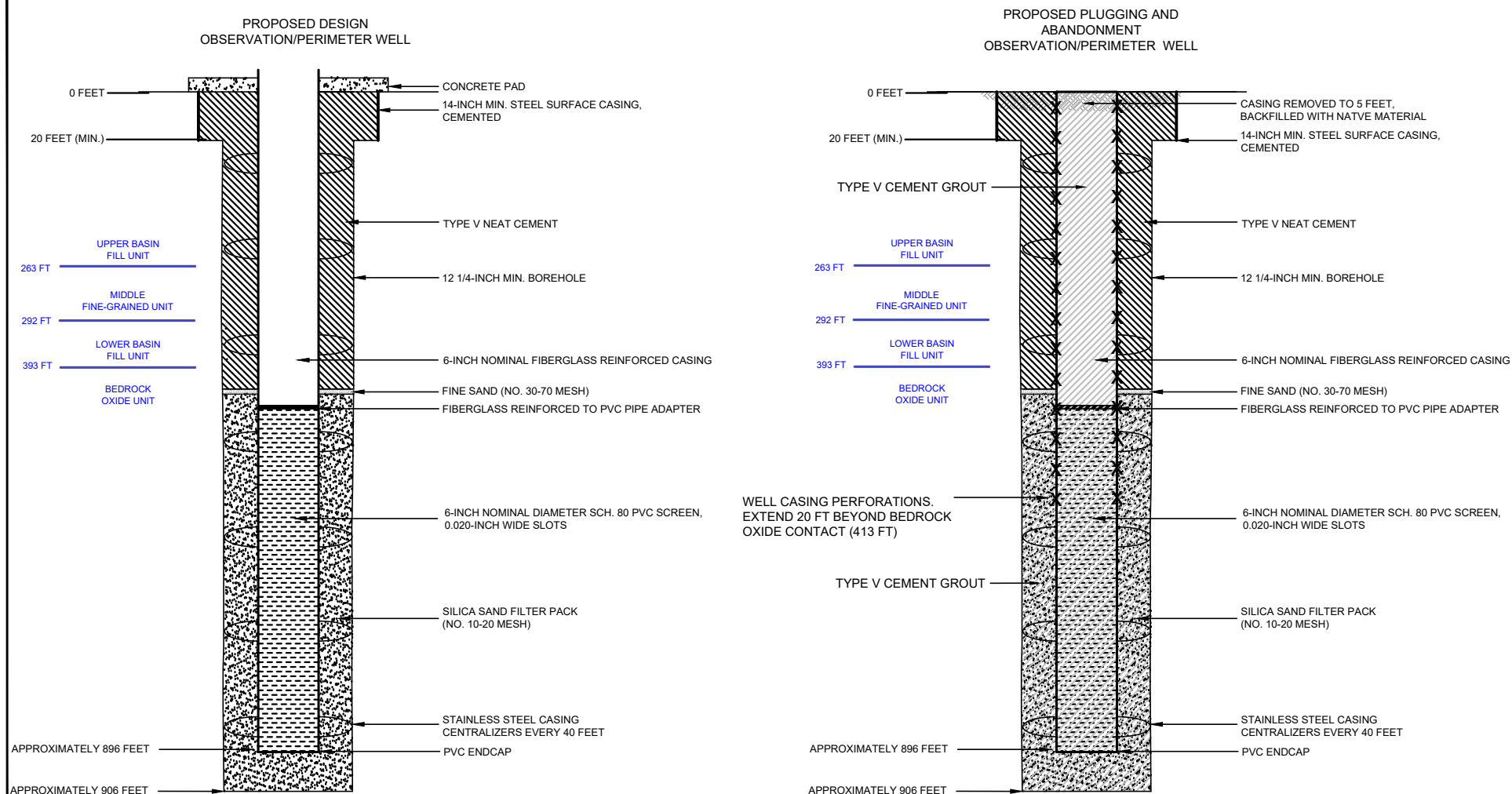


FLORENCE COPPER, INC.
FLORENCE, ARIZONA

**ABANDONMENT SCHEMATIC
RESOURCE BLOCK 82
TYPICAL INJECTION AND
RECOVERY WELL**

SCALE: AS SHOWN
JULY 2019

FIGURE E-43a



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 82 OBSERVATION/PERIMETER WELL

JULY 2019
SCALE: AS SHOWN

FIGURE E-43b

TABLE E-43
WELLS WITHIN RESOURCE BLOCK 82
 FLORENCE COPPER PROJECT
 FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
1092	849674	744859	82	393	433	896
1093	849745	744929	82	393	433	896
1094	849816	745000	82	393	433	896
1095	849816	745071	82	393	433	896
1096	849745	745000	82	393	433	896
1097	849674	744929	82	393	433	896
1098	849604	744859	82	393	433	896
1104	849816	745141	82	393	433	896
1105	849745	745071	82	393	433	896
1106	849674	745000	82	393	433	896
1107	849604	744929	82	393	433	896
1108	849533	744859	82	393	433	896
1115	849816	744859	82	393	433	896
1116	849745	744859	82	393	433	896
1117	849816	744929	82	393	433	896
1118	849886	745071	82	393	433	896
1119	849886	744929	82	393	433	896
1120	849886	745000	82	393	433	896
1121	849887	745141	82	393	433	896
1137	849745	744646	82	393	433	896
1148	849674	744717	82	393	433	896
1154	849604	744788	82	393	433	896
1177	849816	744788	82	393	433	896
1178	849745	744788	82	393	433	896
1179	849674	744788	82	393	433	896
1180	849816	744717	82	393	433	896
1181	849745	744717	82	393	433	896
1192	849957	745071	82	393	433	896
1198	849957	745000	82	393	433	896
1226	849816	744576	82	393	433	896
1230	849816	744646	82	393	433	896
O22	849957	744788	82	393	433	896
O21	850028	744929	82	393	433	896
P43	849886	744717	82	393	433	896
P42	849886	744859	82	393	433	896
P41	849957	744929	82	393	433	896
P40	850028	745000	82	393	433	896

Notes:

ft bgs = feet below ground surface

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 87 Wells - See Attached Table E-44

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.045744

Surface Location

NW 1/4 of NW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.435476

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 87. There are 34 Class III multi-use injection/ recovery wells, 2 dedicated Class III observation, and 4 Class III perimeter wells planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out. The dedicated perimeter observation well will have a design and depth similar to the injection and recovery wells, but will not have a segmented well screen.

The work performed includes plugging and abandonment of the Class III wells in resource block 87. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figures E-44a and E-44b.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

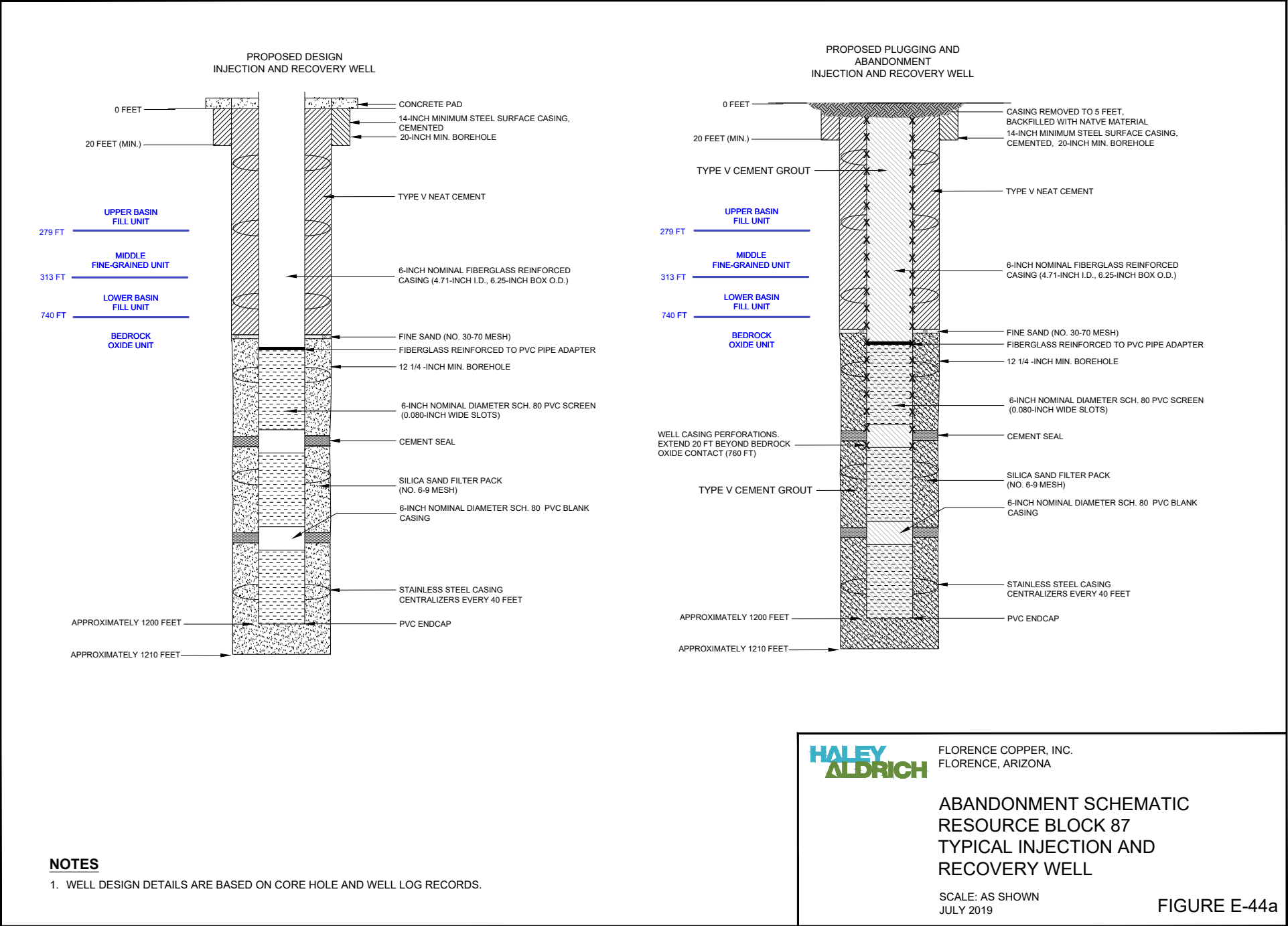
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

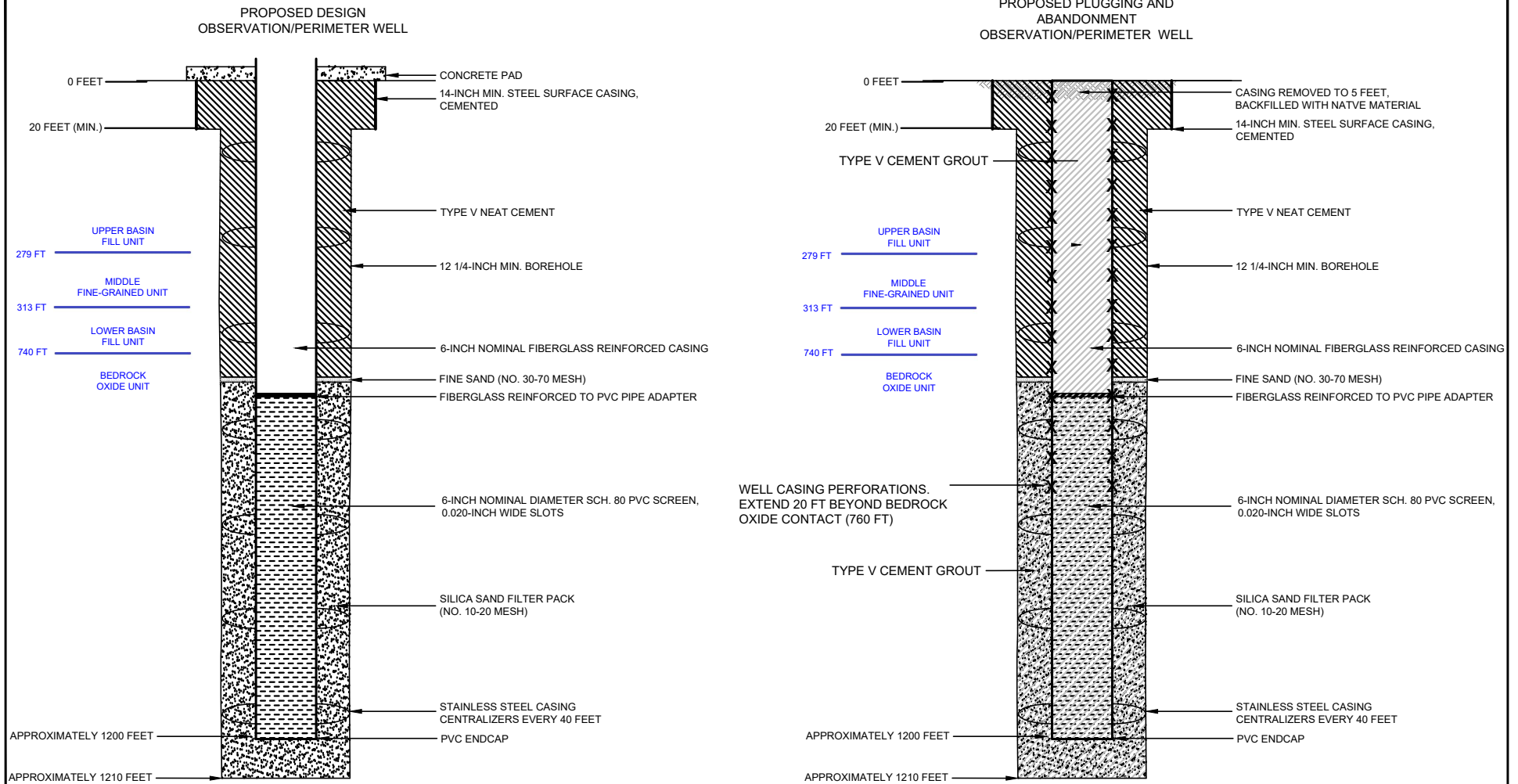
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.





NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 87 OBSERVATION/PERIMETER WELL

JULY 2019
SCALE: AS SHOWN

FIGURE E-44b

TABLE E-44
WELLS WITHIN RESOURCE BLOCK 87
FLORENCE COPPER PROJECT
FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
1765	847624	744505	87	740	780	1200
1766	847624	744434	87	740	780	1200
1771	847694	744505	87	740	780	1200
1780	847411	744293	87	740	780	1200
1781	847482	744364	87	740	780	1200
1782	847553	744434	87	740	780	1200
1783	847482	744293	87	740	780	1200
1784	847553	744364	87	740	780	1200
1786	847411	744222	87	740	780	1200
1904	847553	744505	87	740	780	1200
1905	847482	744576	87	740	780	1200
1906	847553	744576	87	740	780	1200
1907	847412	744646	87	740	780	1200
1908	847482	744646	87	740	780	1200
1909	847341	744717	87	740	780	1200
1910	847412	744717	87	740	780	1200
1911	847341	744788	87	740	780	1200
1914	847412	744788	87	740	780	1200
1916	847482	744717	87	740	780	1200
1917	847553	744646	87	740	780	1200
1918	847625	744575	87	740	780	1200
1925	847482	744434	87	740	780	1200
1926	847412	744364	87	740	780	1200
1930	847341	744434	87	740	780	1200
1931	847412	744505	87	740	780	1200
1932	847482	744505	87	740	780	1200
1933	847412	744434	87	740	780	1200
1934	847341	744364	87	740	780	1200
1939	847341	744576	87	740	780	1200
1940	847412	744576	87	740	780	1200
1941	847341	744505	87	740	780	1200
1948	847270	744646	87	740	780	1200
1949	847341	744646	87	740	780	1200
1954	847270	744717	87	740	780	1200
O33	847270	744222	87	740	780	1200
O34	847200	744505	87	740	780	1200
P64	847341	744152	87	740	780	1200
P65	847341	744293	87	740	780	1200
P66	847270	744434	87	740	780	1200
P67	847270	744576	87	740	780	1200

Notes:

ft bgs = feet below ground surface

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 88 Wells - See Attached Table E-45

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.045677

Surface Location

NE 1/4 of NW 1/4 of Section 33 Township 4S Range 9E

Longitude -111.433451

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 88. There are 49 Class III multi-use injection/ recovery wells, planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out.

The work performed includes plugging and abandonment of the Class III wells in resource block 88. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figure E-45.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

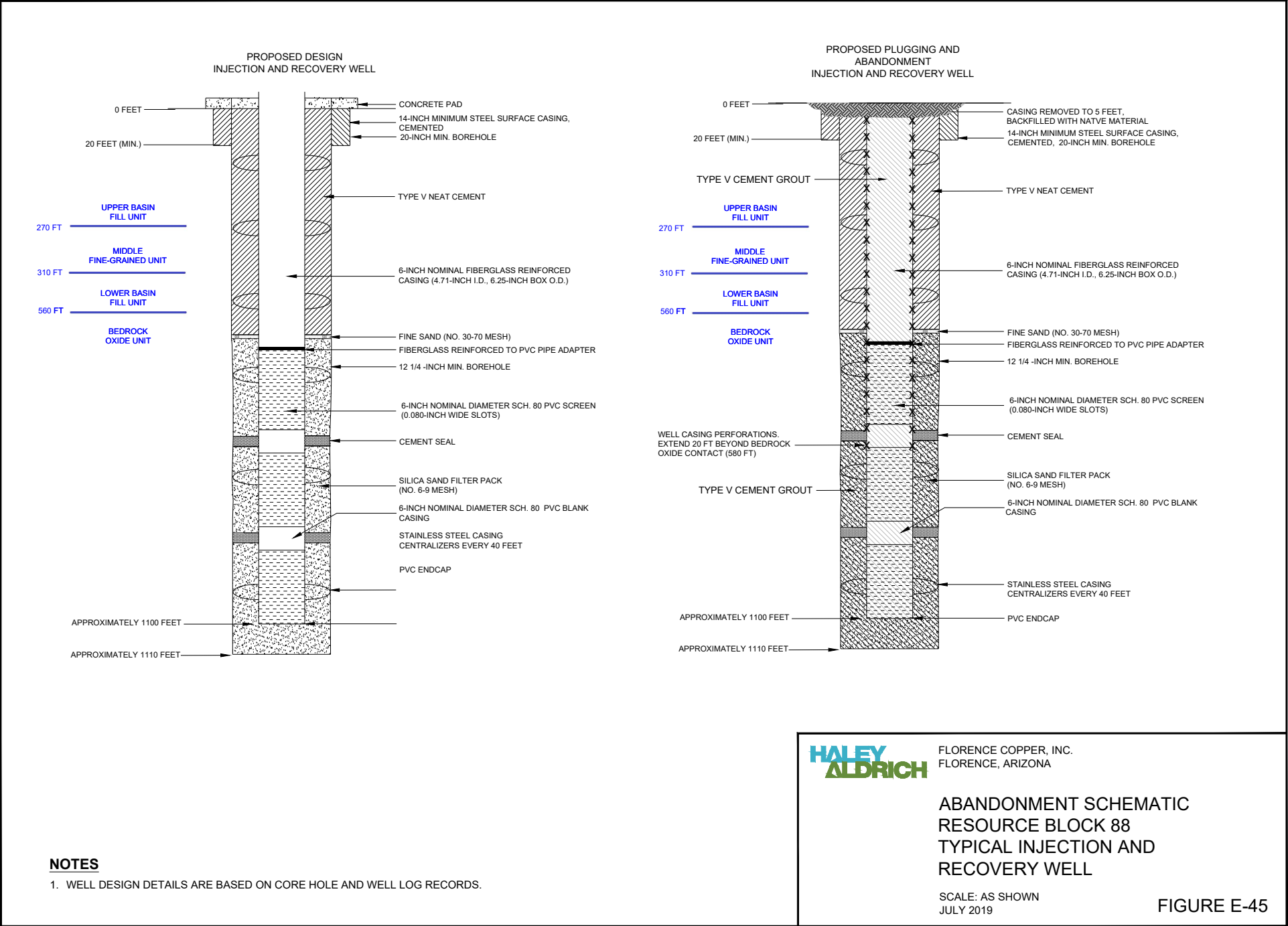


TABLE E-45

WELLS WITHIN RESOURCE BLOCK 88

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
1257	848260	744364	88	560	600	1100
1258	848331	744434	88	560	600	1100
1259	848402	744505	88	560	600	1100
1265	848331	744505	88	560	600	1100
1266	848260	744434	88	560	600	1100
1267	848189	744364	88	560	600	1100
1268	848189	744293	88	560	600	1100
1269	848119	744293	88	560	600	1100
1289	848048	744222	88	560	600	1100
1789	847977	744434	88	560	600	1100
1790	847977	744505	88	560	600	1100
1791	847906	744434	88	560	600	1100
1866	847977	744293	88	560	600	1100
1864	847765	744505	88	560	600	1100
1861	847836	744434	88	560	600	1100
1856	847906	744364	88	560	600	1100
1830	848048	744717	88	560	600	1100
1829	848119	744717	88	560	600	1100
1828	848189	744717	88	560	600	1100
1827	848048	744788	88	560	600	1100
1826	848119	744788	88	560	600	1100
1823	848048	744647	88	560	600	1100
1792	847836	744505	88	560	600	1100
1793	847906	744576	88	560	600	1100
1794	847977	744576	88	560	600	1100
1795	847906	744505	88	560	600	1100
1796	847906	744647	88	560	600	1100
1797	847836	744576	88	560	600	1100
1798	847977	744717	88	560	600	1100
1799	847977	744647	88	560	600	1100
1800	847977	744364	88	560	600	1100
1801	848189	744435	88	560	600	1100
1822	848119	744647	88	560	600	1100
1821	848049	744575	88	560	600	1100
1820	848048	744434	88	560	600	1100
1819	848048	744364	88	560	600	1100
1818	848119	744364	88	560	600	1100
1817	848048	744293	88	560	600	1100
1816	848048	744505	88	560	600	1100

TABLE E-45

WELLS WITHIN RESOURCE BLOCK 88

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
1815	848119	744576	88	560	600	1100
1814	848189	744647	88	560	600	1100
1811	848260	744647	88	560	600	1100
1810	848189	744576	88	560	600	1100
1809	848119	744505	88	560	600	1100
1808	848119	744434	88	560	600	1100
1807	848189	744505	88	560	600	1100
1806	848260	744576	88	560	600	1100
1803	848331	744576	88	560	600	1100
1802	848260	744505	88	560	600	1100

Notes:*ft bgs = feet below ground surface*

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 89 Wells - See Attached Table E-46

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.045680

Surface Location

NE 1/4 of NW 1/4 of Section 33 Township 4S Range 9E

Longitude -111.431128

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 89. There are 50 Class III multi-use injection/ recovery wells, planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out.

The work performed includes plugging and abandonment of the Class III wells in resource block 89. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figure E-46.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

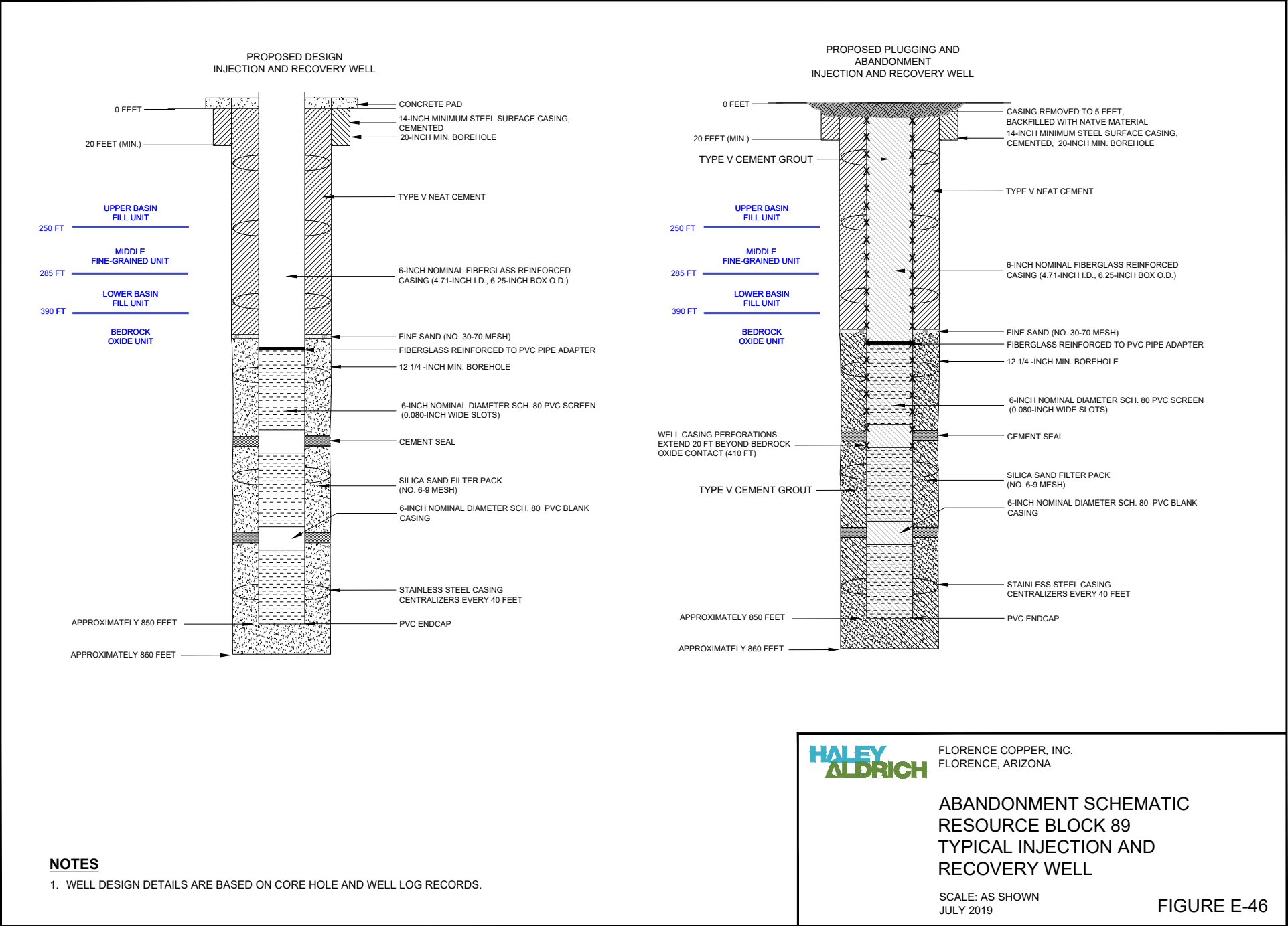


TABLE E-46

WELLS WITHIN RESOURCE BLOCK 89

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
1296	848614	744364	89	390	430	850
1297	848684	744434	89	390	430	850
1298	848684	744505	89	390	430	850
1299	848614	744434	89	390	430	850
1305	848543	744505	89	390	430	850
1306	848614	744576	89	390	430	850
1307	848684	744576	89	390	430	850
1308	848614	744505	89	390	430	850
1309	848543	744434	89	390	430	850
1313	848543	744576	89	390	430	850
1312	848614	744646	89	390	430	850
1318	848684	744717	89	390	430	850
1314	848472	744505	89	390	430	850
1320	848684	744293	89	390	430	850
1319	848684	744646	89	390	430	850
1322	848684	744364	89	390	430	850
1323	848755	744505	89	390	430	850
1324	848755	744293	89	390	430	850
1325	848755	744364	89	390	430	850
1326	848755	744434	89	390	430	850
1327	848756	744575	89	390	430	850
1328	848755	744646	89	390	430	850
1329	848755	744788	89	390	430	850
1330	848755	744717	89	390	430	850
1362	848755	744222	89	390	430	850
1375	849109	744505	89	390	430	850
1376	849038	744434	89	390	430	850
1377	848967	744364	89	390	430	850
1378	848896	744293	89	390	430	850
1379	848826	744364	89	390	430	850
1380	848896	744434	89	390	430	850
1381	848967	744505	89	390	430	850
1382	849038	744576	89	390	430	850
1383	849038	744505	89	390	430	850
1384	848967	744434	89	390	430	850
1385	848896	744364	89	390	430	850
1386	848826	744293	89	390	430	850
1387	848826	744505	89	390	430	850
1388	848896	744576	89	390	430	850

TABLE E-46

WELLS WITHIN RESOURCE BLOCK 89

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
1390	848967	744576	89	390	430	850
1391	848896	744505	89	390	430	850
1392	848826	744434	89	390	430	850
1393	848826	744646	89	390	430	850
1394	848896	744717	89	390	430	850
1396	848896	744646	89	390	430	850
1397	848826	744576	89	390	430	850
1399	848826	744717	89	390	430	850
1400	848826	744788	89	390	430	850
1421	848826	744222	89	390	430	850
1462	848967	744646	89	390	430	850

Notes:*ft bgs = feet below ground surface*

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 90 Wells - See Attached Table E-47

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.046065

Surface Location

SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.428845

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 90. There are 29 Class III multi-use injection/ recovery wells, 2 dedicated Class III observation, and 5 Class III perimeter wells planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out. The dedicated perimeter observation well will have a design and depth similar to the injection and recovery wells, but will not have a segmented well screen.

The work performed includes plugging and abandonment of the Class III wells in resource block 90. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figures E-47a and E-47b.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

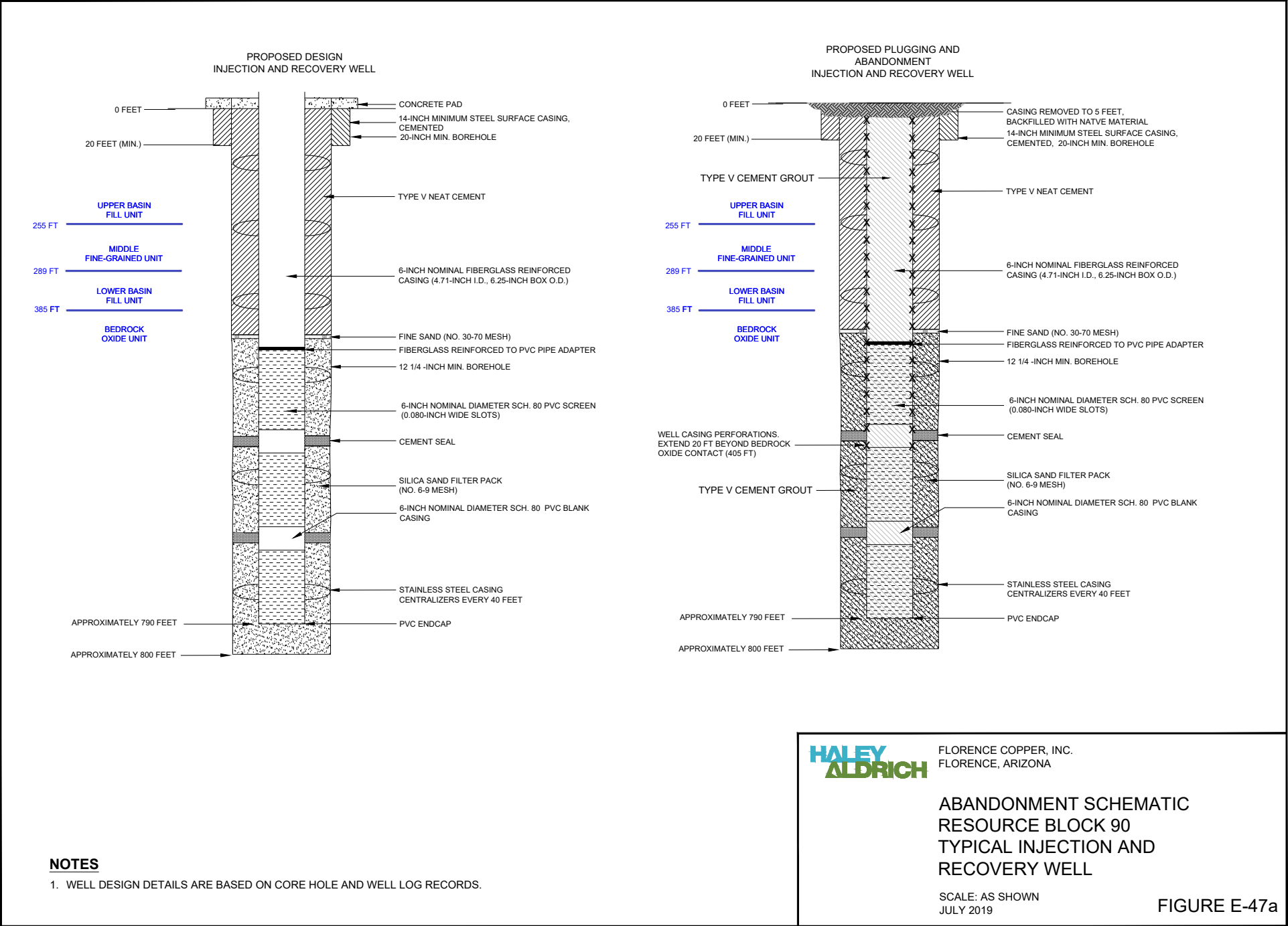
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

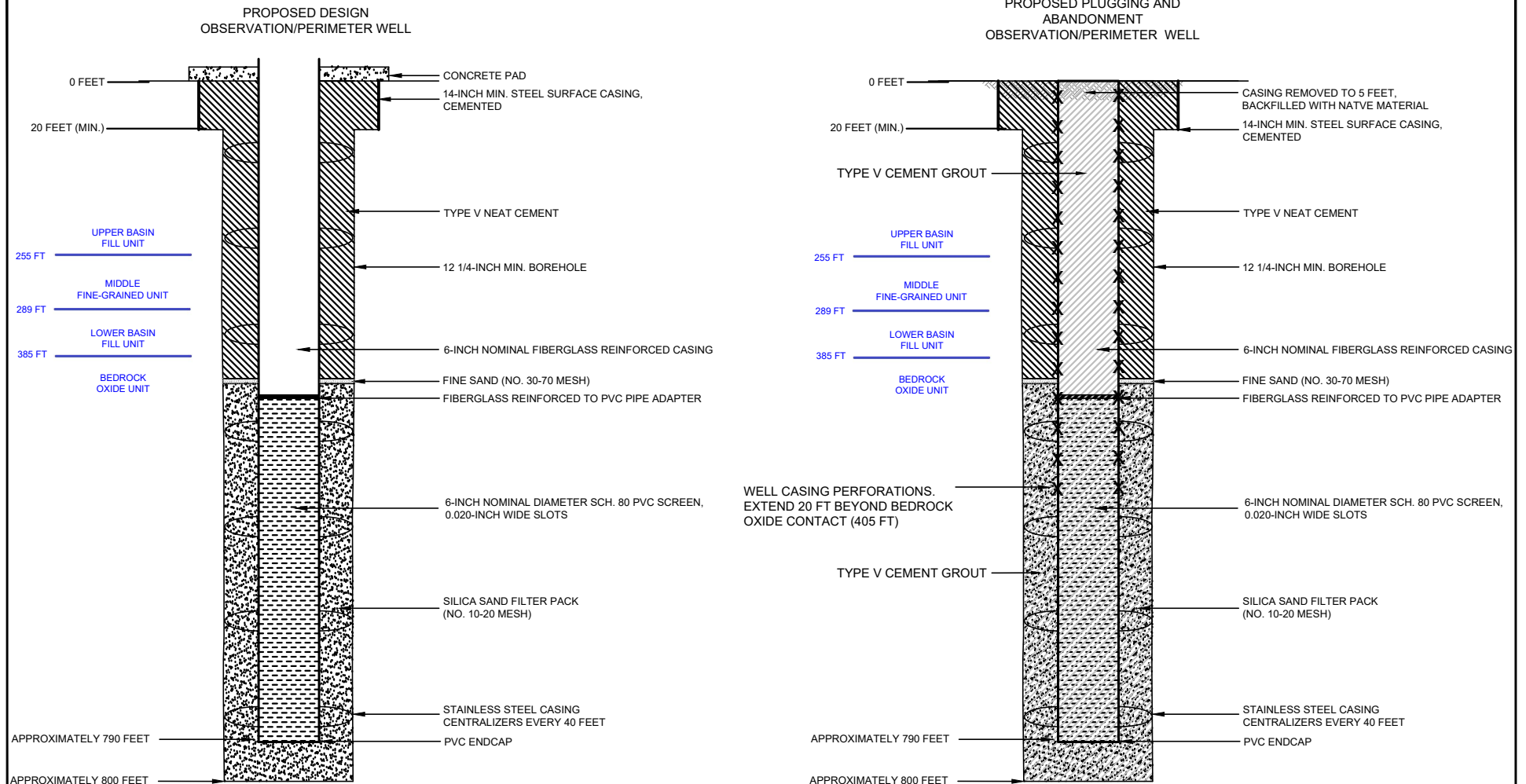
For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.





NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 90 OBSERVATION/PERIMETER WELL

JULY 2019
SCALE: AS SHOWN

FIGURE E-47b

TABLE E-47
WELLS WITHIN RESOURCE BLOCK 90
 FLORENCE COPPER PROJECT
 FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
1127	849674	744505	90	385	425	790
1128	849745	744505	90	385	425	790
1134	849533	744505	90	385	425	790
1135	849604	744576	90	385	425	790
1136	849674	744646	90	385	425	790
1138	849674	744576	90	385	425	790
1139	849604	744505	90	385	425	790
1144	849391	744505	90	385	425	790
1145	849462	744576	90	385	425	790
1146	849533	744646	90	385	425	790
1147	849604	744717	90	385	425	790
1149	849604	744646	90	385	425	790
1150	849533	744576	90	385	425	790
1151	849462	744505	90	385	425	790
1155	849533	744717	90	385	425	790
1156	849462	744646	90	385	425	790
1157	849391	744576	90	385	425	790
1158	849321	744505	90	385	425	790
1160	849250	744505	90	385	425	790
1161	849321	744576	90	385	425	790
1162	849391	744646	90	385	425	790
1163	849462	744717	90	385	425	790
1164	849533	744788	90	385	425	790
1165	849462	744788	90	385	425	790
1166	849391	744717	90	385	425	790
1167	849321	744646	90	385	425	790
1168	849250	744576	90	385	425	790
1169	849179	744505	90	385	425	790
1225	849745	744576	90	385	425	790
O23	849816	744364	90	385	425	790
O24	849533	744364	90	385	425	790
P44	849886	744434	90	385	425	790
P45	849745	744434	90	385	425	790
P46	849604	744434	90	385	425	790
P47	849462	744434	90	385	425	790
P48	849321	744434	90	385	425	790

Notes:

ft bgs = feet below ground surface

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 96 Wells - See Attached Table E-48

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.045109

Surface Location

NE 1/4 of NW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.434644

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 96. There are 30 Class III multi-use injection/ recovery wells, 3 dedicated Class III observation, and 5 Class III perimeter wells planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out. The dedicated perimeter observation well will have a design and depth similar to the injection and recovery wells, but will not have a segmented well screen.

The work performed includes plugging and abandonment of the Class III wells in resource block 96. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figures E-48a and E-48b.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

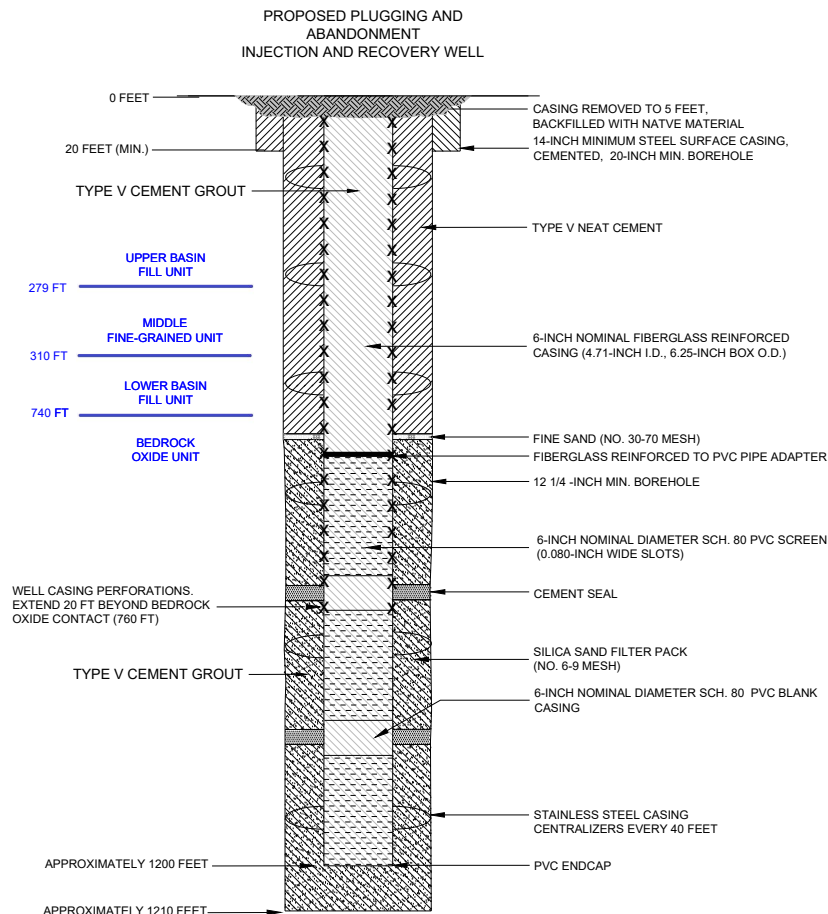
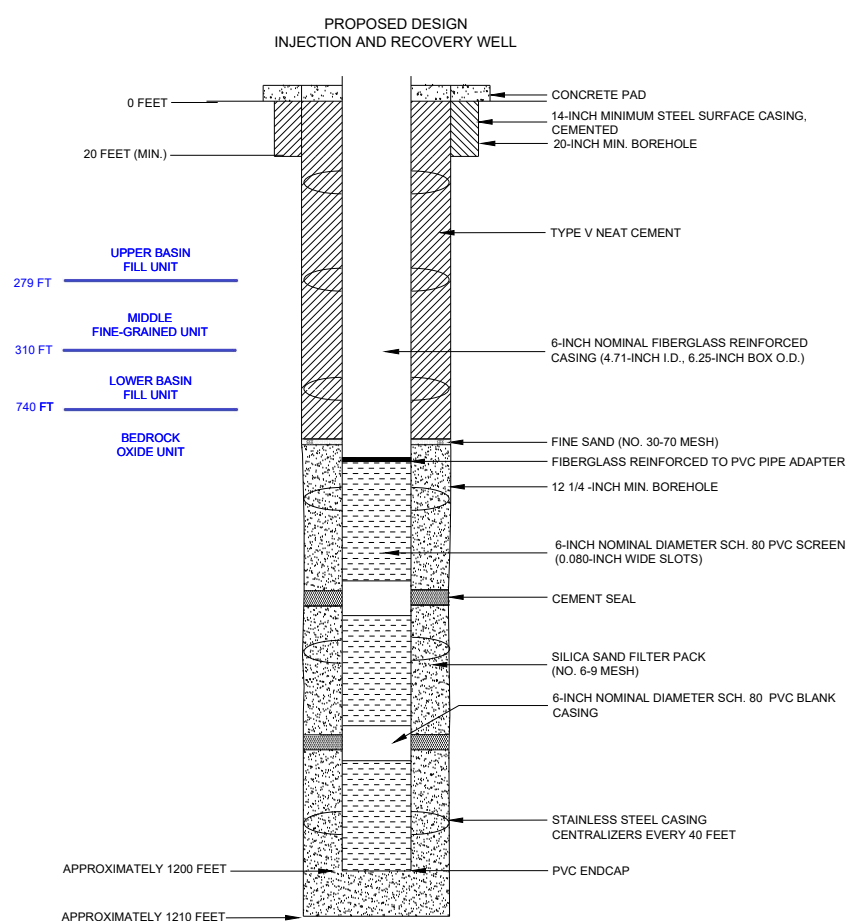
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

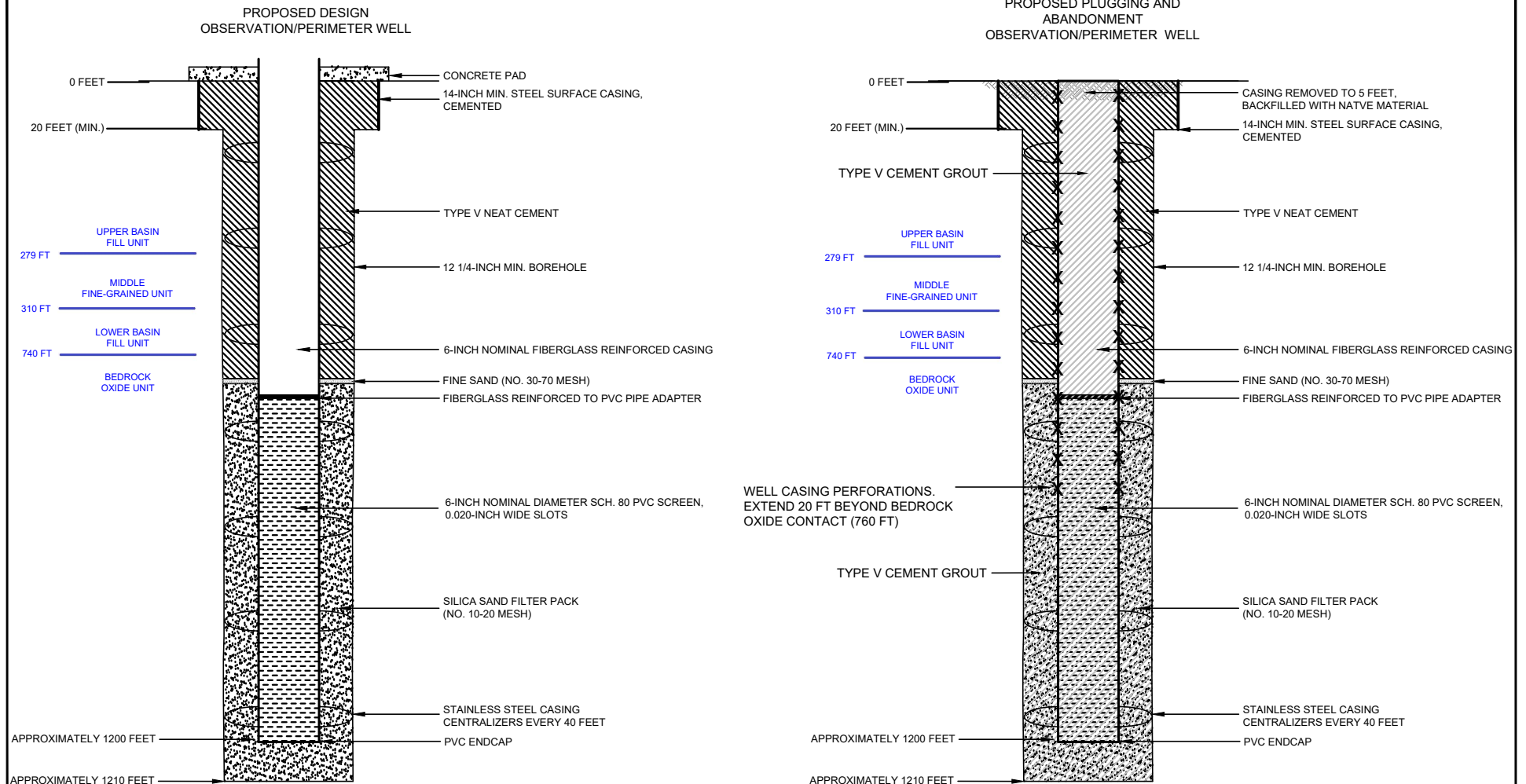


FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 96 TYPICAL INJECTION AND RECOVERY WELL

SCALE: AS SHOWN
JULY 2019

FIGURE E-48a



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 96 OBSERVATION/PERIMETER WELL

JULY 2019
SCALE: AS SHOWN

FIGURE E-48b

TABLE E-48
WELLS WITHIN RESOURCE BLOCK 96
 FLORENCE COPPER PROJECT
 FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
1287	847977	744151	96	740	780	1200
1290	848048	744151	96	740	780	1200
1831	847553	744293	96	740	780	1200
1832	847624	744293	96	740	780	1200
1833	847624	744364	96	740	780	1200
1842	847411	744152	96	740	780	1200
1844	847553	744222	96	740	780	1200
1845	847482	744222	96	740	780	1200
1846	847553	744152	96	740	780	1200
1847	847482	744152	96	740	780	1200
1853	847624	744222	96	740	780	1200
1854	847624	744152	96	740	780	1200
1855	847836	744293	96	740	780	1200
1857	847836	744364	96	740	780	1200
1858	847765	744293	96	740	780	1200
1859	847694	744364	96	740	780	1200
1860	847765	744434	96	740	780	1200
1862	847765	744364	96	740	780	1200
1863	847694	744293	96	740	780	1200
1865	847694	744434	96	740	780	1200
1867	847906	744293	96	740	780	1200
1872	847765	744152	96	740	780	1200
1873	847836	744152	96	740	780	1200
1876	847765	744222	96	740	780	1200
1877	847694	744152	96	740	780	1200
1878	847694	744222	96	740	780	1200
1879	847977	744222	96	740	780	1200
1880	847906	744222	96	740	780	1200
1881	847836	744222	96	740	780	1200
1882	847906	744152	96	740	780	1200
O30	848119	744010	96	740	780	1200
O31	847836	744010	96	740	780	1200
O32	847553	744010	96	740	780	1200
P59	848048	744081	96	740	780	1200
P60	847906	744081	96	740	780	1200
P61	847765	744081	96	740	780	1200
P62	847624	744081	96	740	780	1200
P63	847482	744081	96	740	780	1200

Notes:

ft bgs = feet below ground surface

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 97 Wells - See Attached Table E-49

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.045064

Surface Location

Longitude -111.432321

NE 1/4 of NW 1/4 of Section 28 Township 4S Range 9E

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 97. There are 30 Class III multi-use injection/ recovery wells, 2 dedicated Class III observation, and 5 Class III perimeter wells planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out. The dedicated perimeter observation well will have a design and depth similar to the injection and recovery wells, but will not have a segmented well screen.

The work performed includes plugging and abandonment of the Class III wells in resource block 97. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figures E-49a and E-49b.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

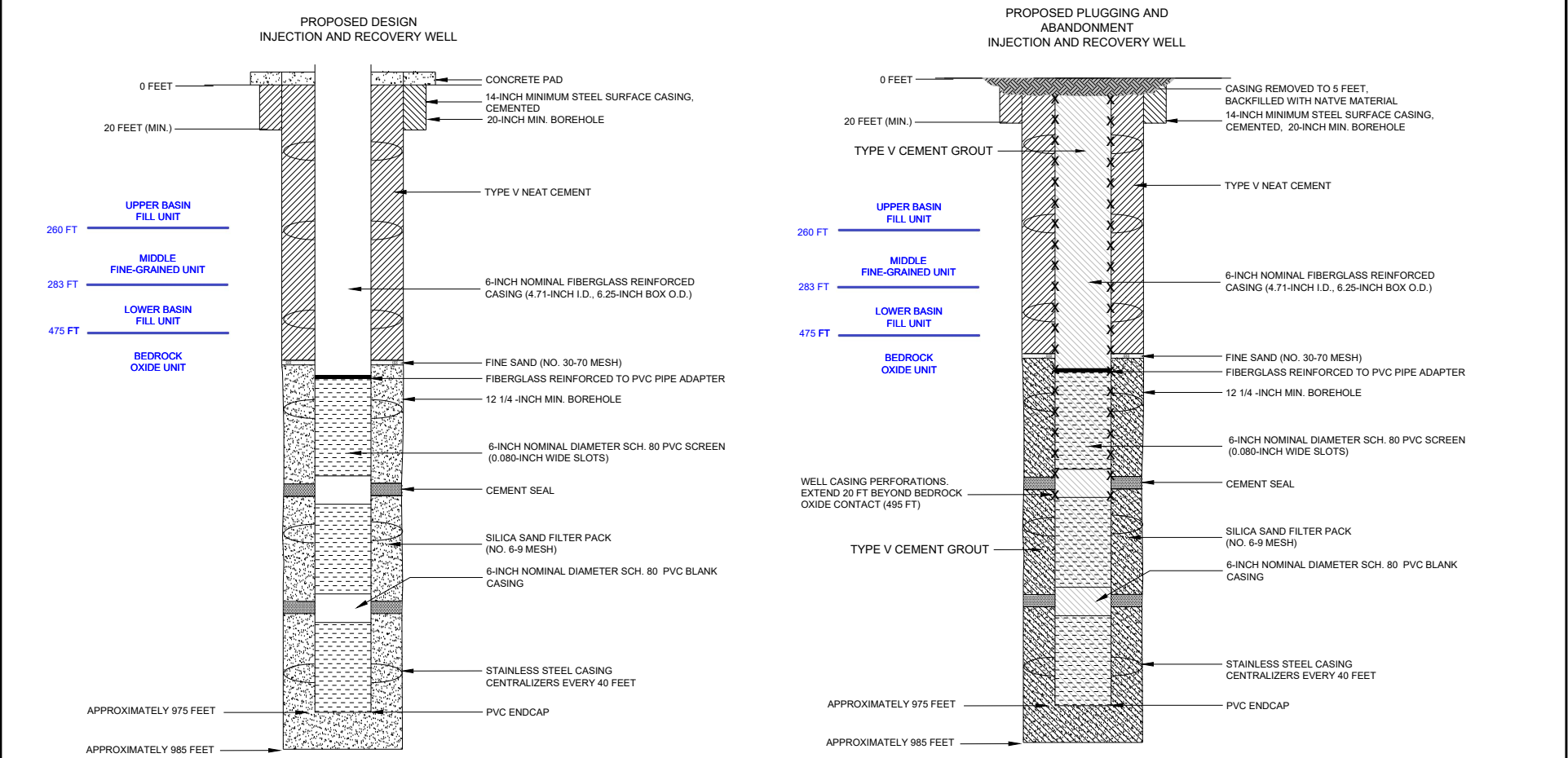
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

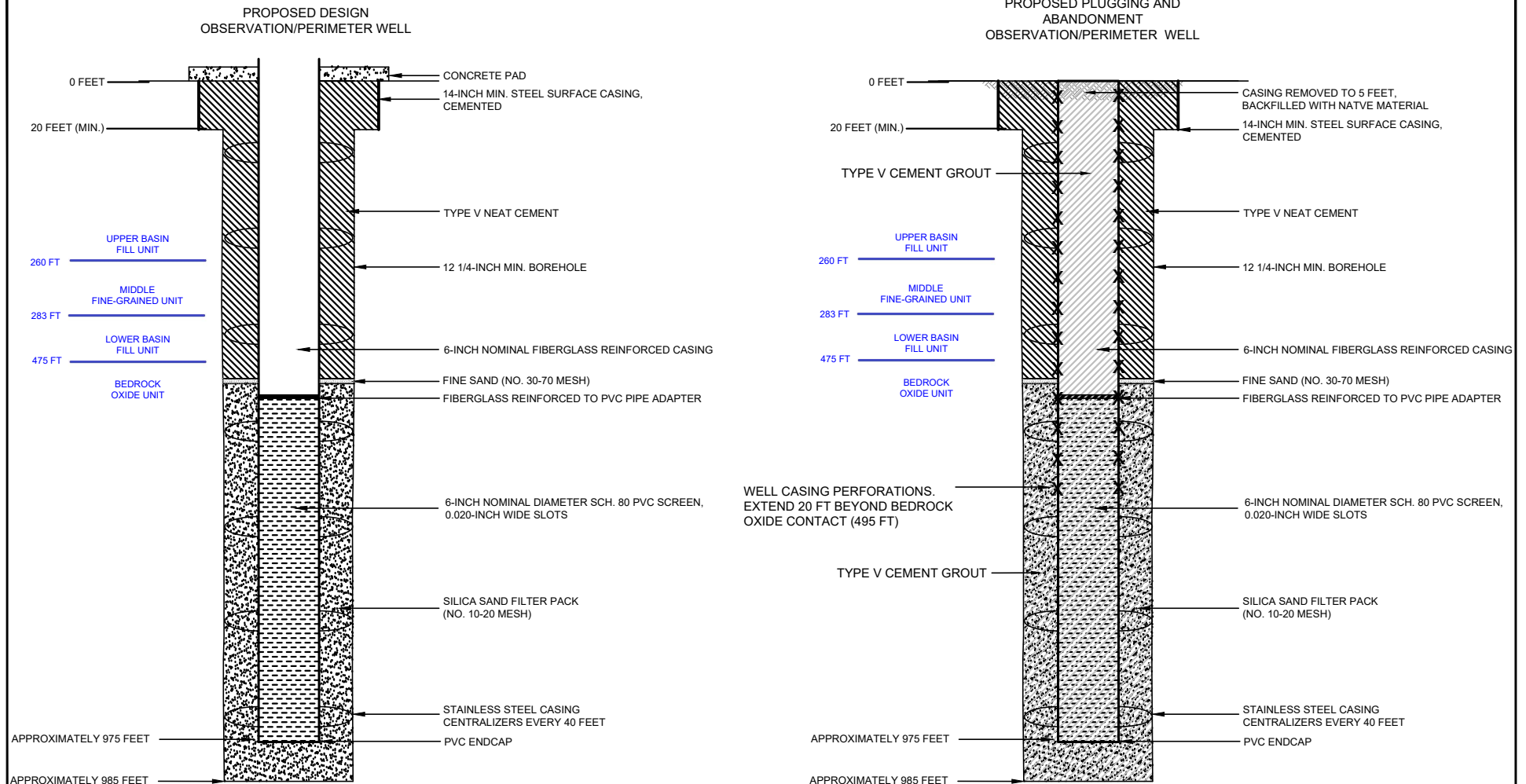


FLORENCE COPPER, INC.
FLORENCE, ARIZONA

**ABANDONMENT SCHEMATIC
RESOURCE BLOCK 97
TYPICAL INJECTION AND
RECOVERY WELL**

SCALE: AS SHOWN
JULY 2019

FIGURE E-49a



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 97 OBSERVATION/PERIMETER WELL

JULY 2019
SCALE: AS SHOWN

FIGURE E-49b

TABLE E-49
WELLS WITHIN RESOURCE BLOCK 97
FLORENCE COPPER PROJECT
FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
1295	848543	744293	97	475	485	975
1300	848543	744364	97	475	485	975
1301	848472	744293	97	475	485	975
1302	848331	744293	97	475	485	975
1303	848402	744364	97	475	485	975
1304	848472	744434	97	475	485	975
1310	848472	744364	97	475	485	975
1311	848402	744293	97	475	485	975
1315	848402	744434	97	475	485	975
1316	848331	744364	97	475	485	975
1317	848260	744293	97	475	485	975
1321	848614	744293	97	475	485	975
1342	848543	744152	97	475	485	975
1343	848472	744222	97	475	485	975
1344	848401	744152	97	475	485	975
1345	848401	744222	97	475	485	975
1346	848331	744222	97	475	485	975
1347	848260	744151	97	475	485	975
1354	848260	744222	97	475	485	975
1355	848189	744222	97	475	485	975
1356	848189	744151	97	475	485	975
1357	848119	744151	97	475	485	975
1358	848684	744222	97	475	485	975
1359	848614	744222	97	475	485	975
1360	848543	744222	97	475	485	975
1361	848684	744152	97	475	485	975
1432	848331	744151	97	475	485	975
1433	848614	744152	97	475	485	975
1434	848472	744152	97	475	485	975
1435	848755	744151	97	475	485	975
O28	848684	744010	97	475	485	975
O29	848401	744010	97	475	485	975
P54	848755	744081	97	475	485	975
P55	848614	744081	97	475	485	975
P56	848472	744081	97	475	485	975
P57	848331	744081	97	475	485	975
P58	848189	744081	97	475	485	975

Notes:

ft bgs = feet below ground surface

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Block 98 Wells - See Attached Table E-50

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.045068

Surface Location

NW 1/4 of NE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.430281

See Attached Table
for Individual Well
Coordinates.

ft. from (N/S) Line of quarter section
ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence January 2027
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

This plugging and abandonment applies to wells Class III wells to be constructed in block 98. There are 15 Class III multi-use injection/ recovery wells, 2 dedicated Class III observation, and 5 Class III perimeter wells planned for construction in this block. The injection and recovery wells will be of uniform design, and will be used for injection and recovery on an alternate basis. Some of the injection and recovery wells will be used as perimeter and observation wells prior to well field build-out. The dedicated perimeter observation well will have a design and depth similar to the injection and recovery wells, but will not have a segmented well screen.

The work performed includes plugging and abandonment of the Class III wells in resource block 98. Plugging and abandonment will be accomplished following procedures defined in Attachment E of the application to modify UIC R9UIC-AZ3-FY11-1. Plugging and abandonment details are shown on the attached Figures E-50a and E-50b.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

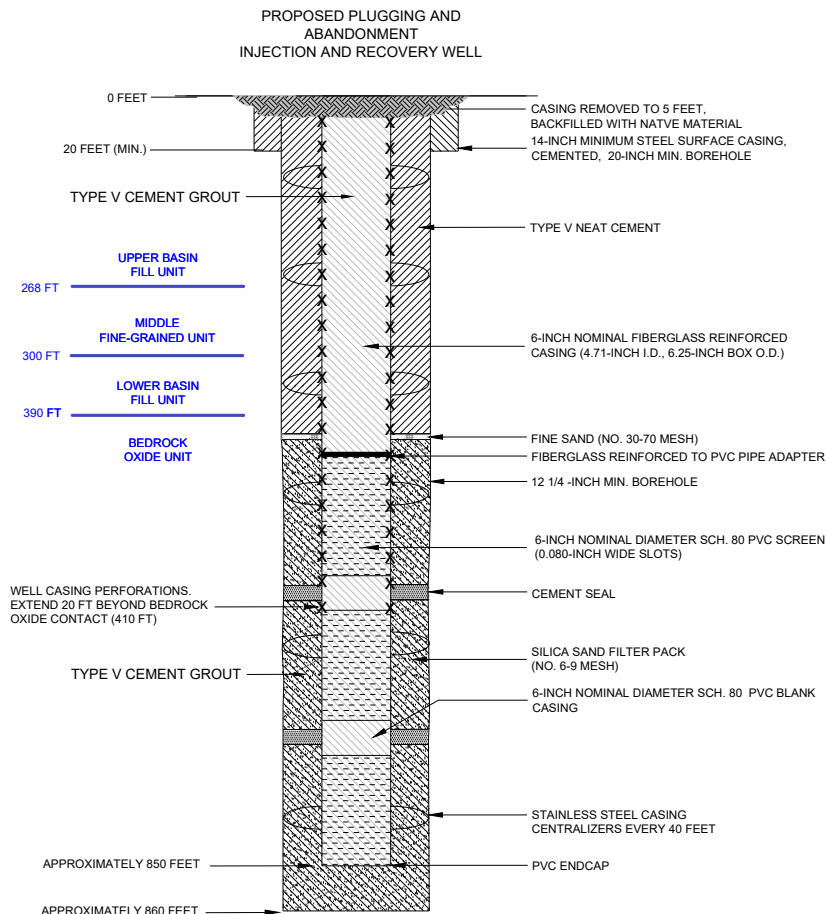
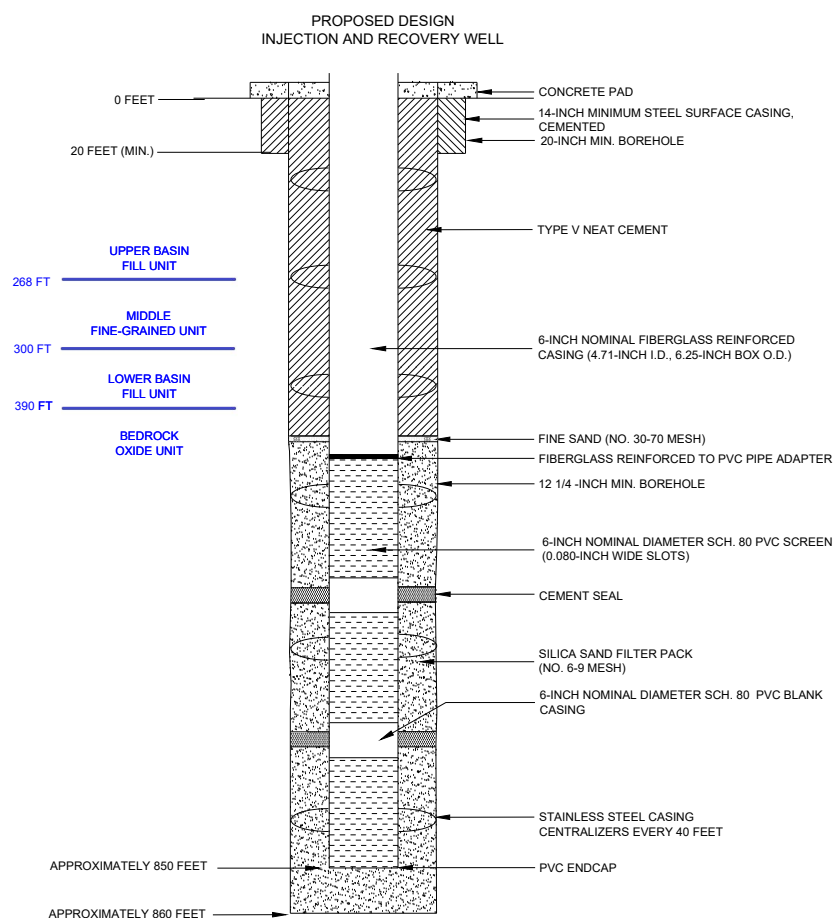
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

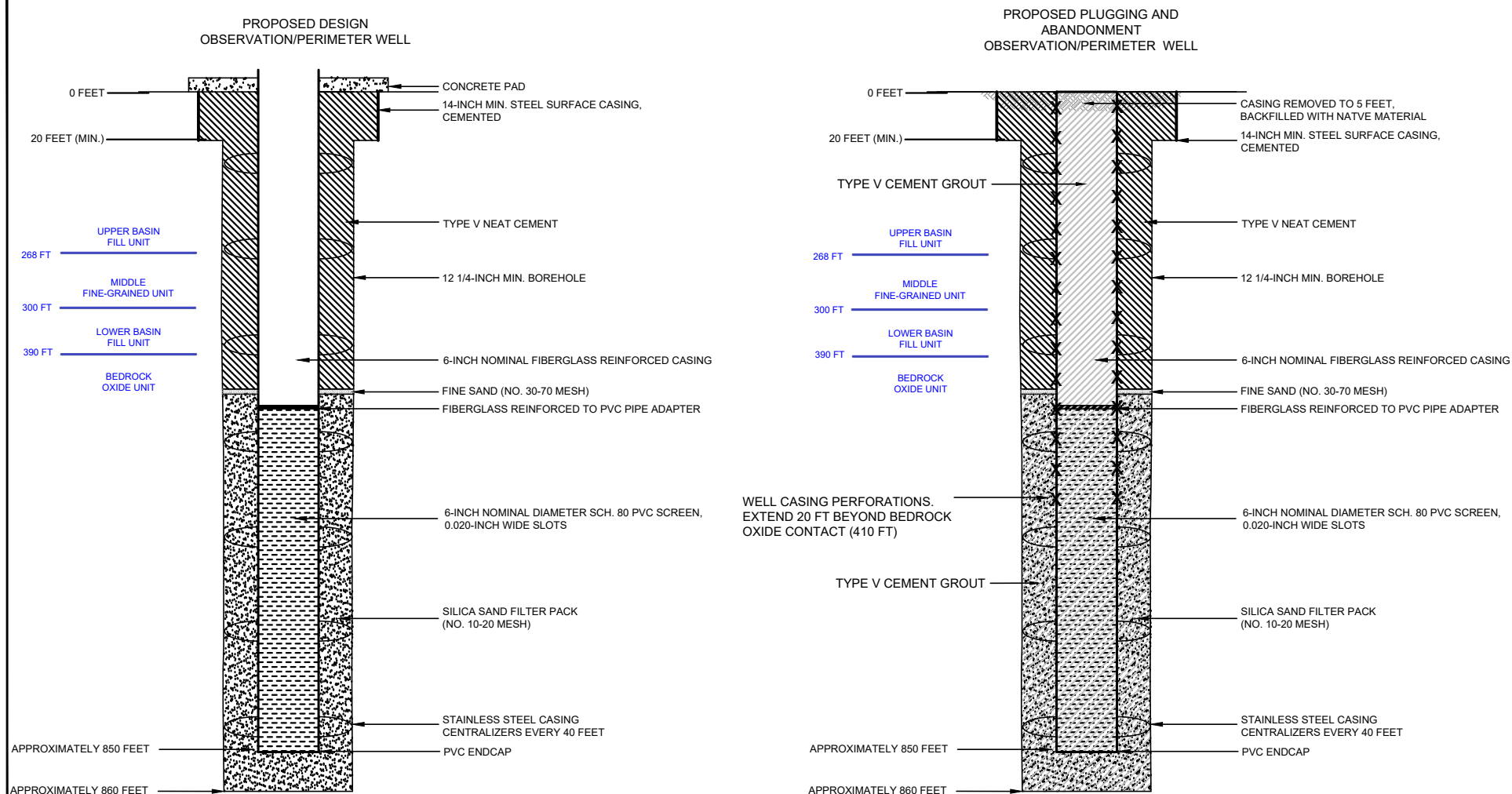


FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 98 TYPICAL INJECTION AND RECOVERY WELL

SCALE: AS SHOWN
JULY 2019

FIGURE E-50a



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC RESOURCE BLOCK 98 OBSERVATION/PERIMETER WELL

JULY 2019
SCALE: AS SHOWN

FIGURE E-50b

TABLE E-50
WELLS WITHIN RESOURCE BLOCK 98
 FLORENCE COPPER PROJECT
 FLORENCE, ARIZONA

Well Number	Easting	Northing	Resource Block	Depth to Top of Bedrock (ft bgs)	Depth to Top of Injection Zone (ft bgs)	Depth to Bottom of Injection Zone (ft bgs)
1418	848967	744151	98	390	430	850
1425	849109	744151	98	390	430	850
1436	849038	744151	98	390	430	850
1437	848896	744151	98	390	430	850
1372	848967	744293	98	390	430	850
1373	849038	744364	98	390	430	850
1374	849109	744434	98	390	430	850
1407	849109	744293	98	390	430	850
1408	849038	744293	98	390	430	850
1409	849109	744364	98	390	430	850
1419	848896	744222	98	390	430	850
1420	848826	744151	98	390	430	850
1422	849109	744222	98	390	430	850
1423	849038	744222	98	390	430	850
1424	848967	744222	98	390	430	850
O25	849250	744364	98	390	430	850
O26	849250	744222	98	390	430	850
O27	848967	744010	98	390	430	850
P49	849179	744434	98	390	430	850
P50	849179	744293	98	390	430	850
P51	849179	744151	98	390	430	850
P52	849038	744081	98	390	430	850
P53	848896	744081	98	390	430	850

Notes:

ft bgs = feet below ground surface

EXHIBIT E-2

**Plugging and Abandonment Forms for
Non-Class III Wells within AOR**

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

84

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05329314

Surface Location

SE 1/4 of NE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4232294

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the planned clean-out depth to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

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For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

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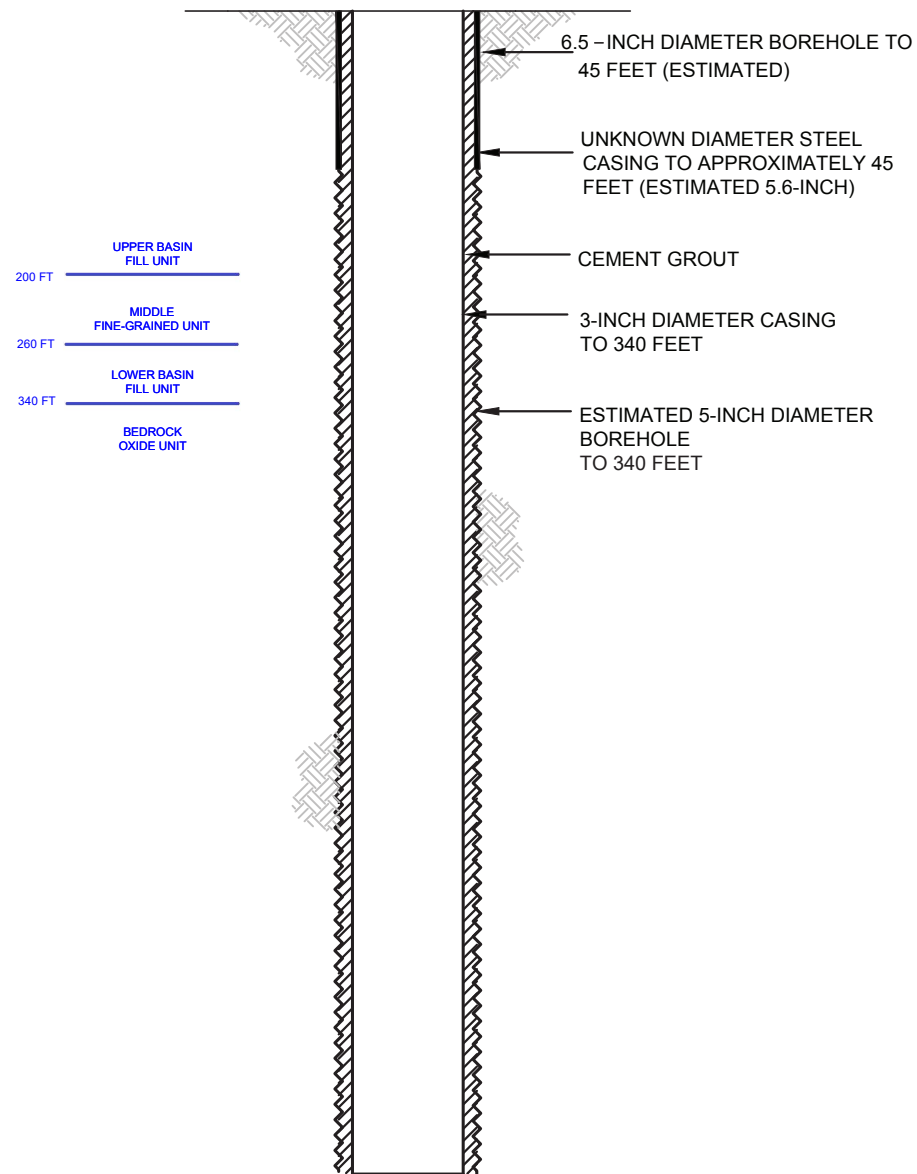
For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

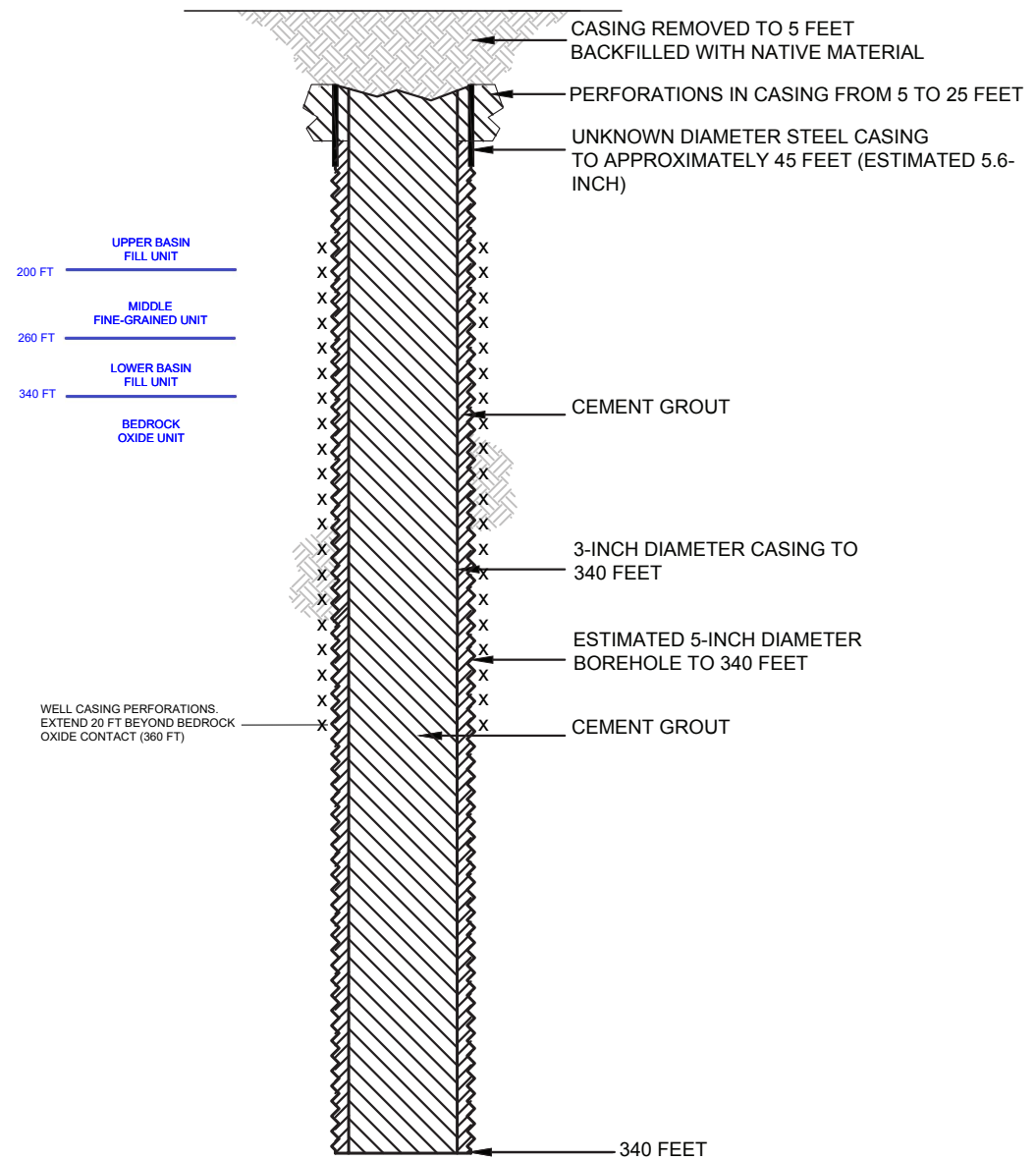
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PROPOSED DESIGN EXPLORATION BOREHOLE 84



PROPOSED PLUGGING AND ABANDONMENT EXPLORATION BOREHOLE 84



**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT EXPLORATION BOREHOLE 84

**FLORENCE
COPPER INC.**

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

BIA 10B

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04889263

Surface Location

SE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4300199

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the planned clean-out depth to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

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10/3/2019

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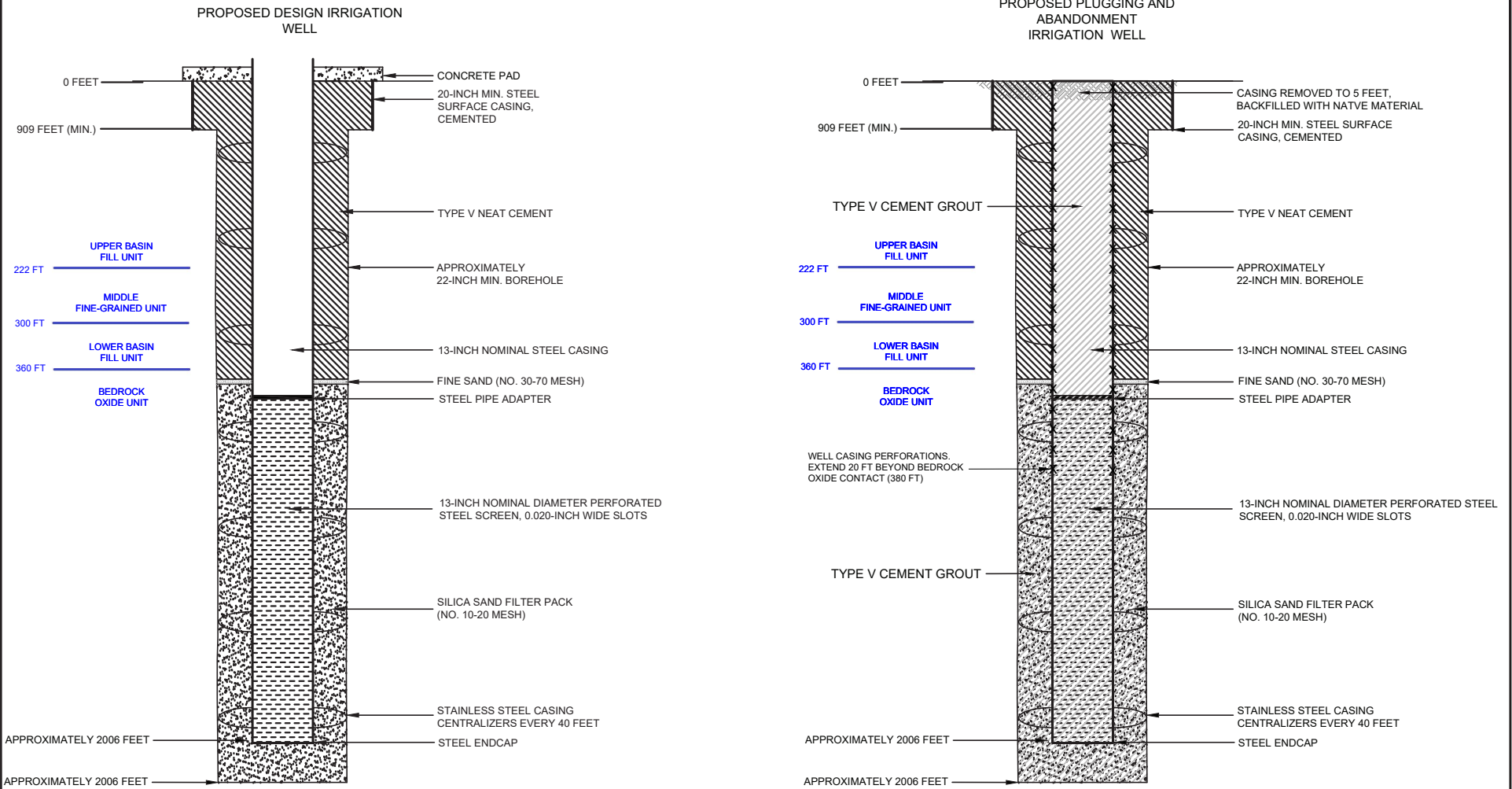
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NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

**ABANDONMENT
SCHEMATIC IRRIGATION
WELL BIA 10B**

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

BIA 9

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04917142

Surface Location

SW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4359237

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

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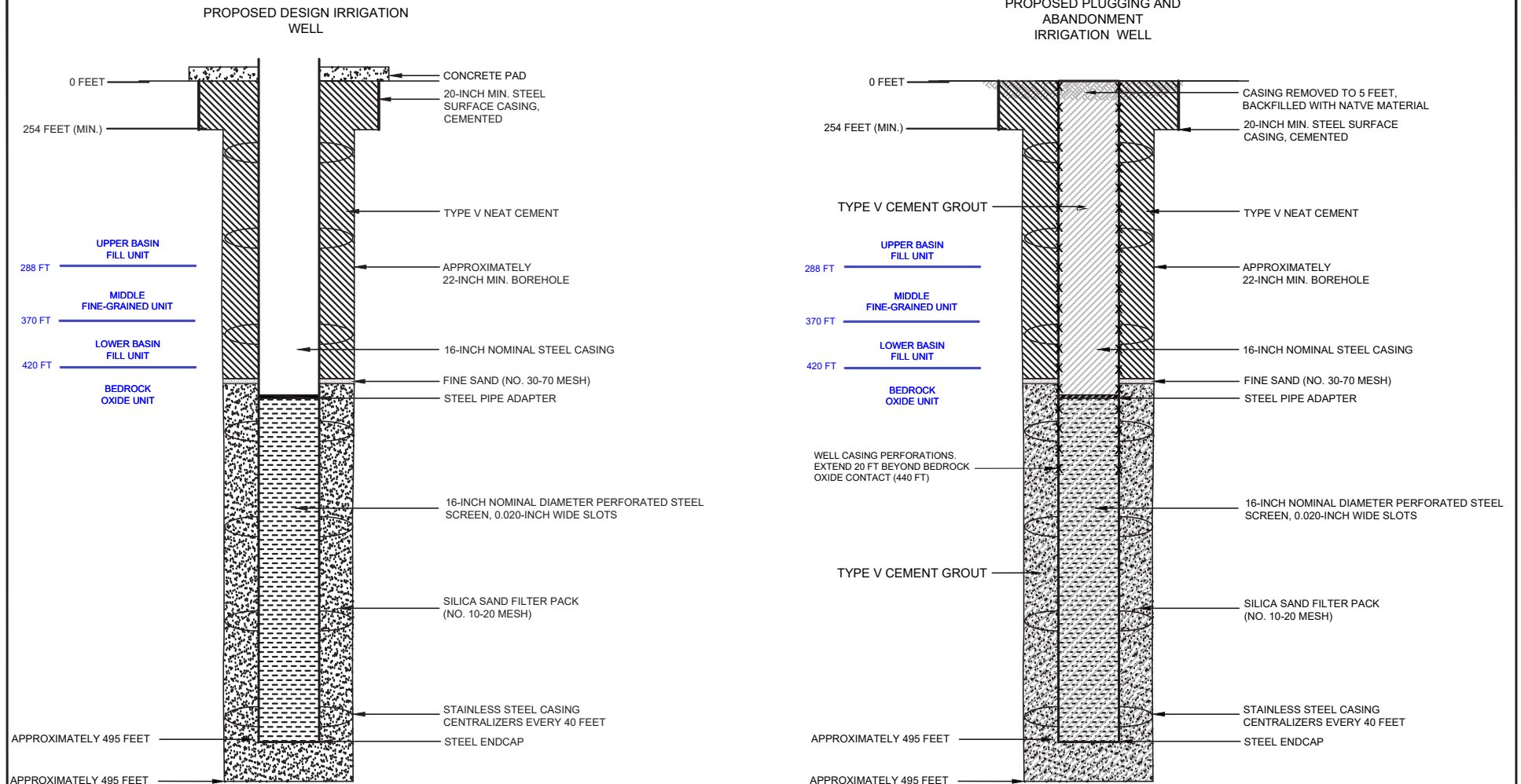
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**HALEY
ALDRICH**

FLORENCE COPPER, INC.
 FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC IRRIGATION WELL BIA 9

SEPTEMBER 2019
 SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
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Permit or EPA ID Number

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API Number

Full Well Name

DM-A

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.050933

Surface Location

NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4298987

ft. from (N/S) Line of quarter section

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Well Class

Timing of Action (pick one)

Type of Action (pick one)

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☒ Class III
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10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

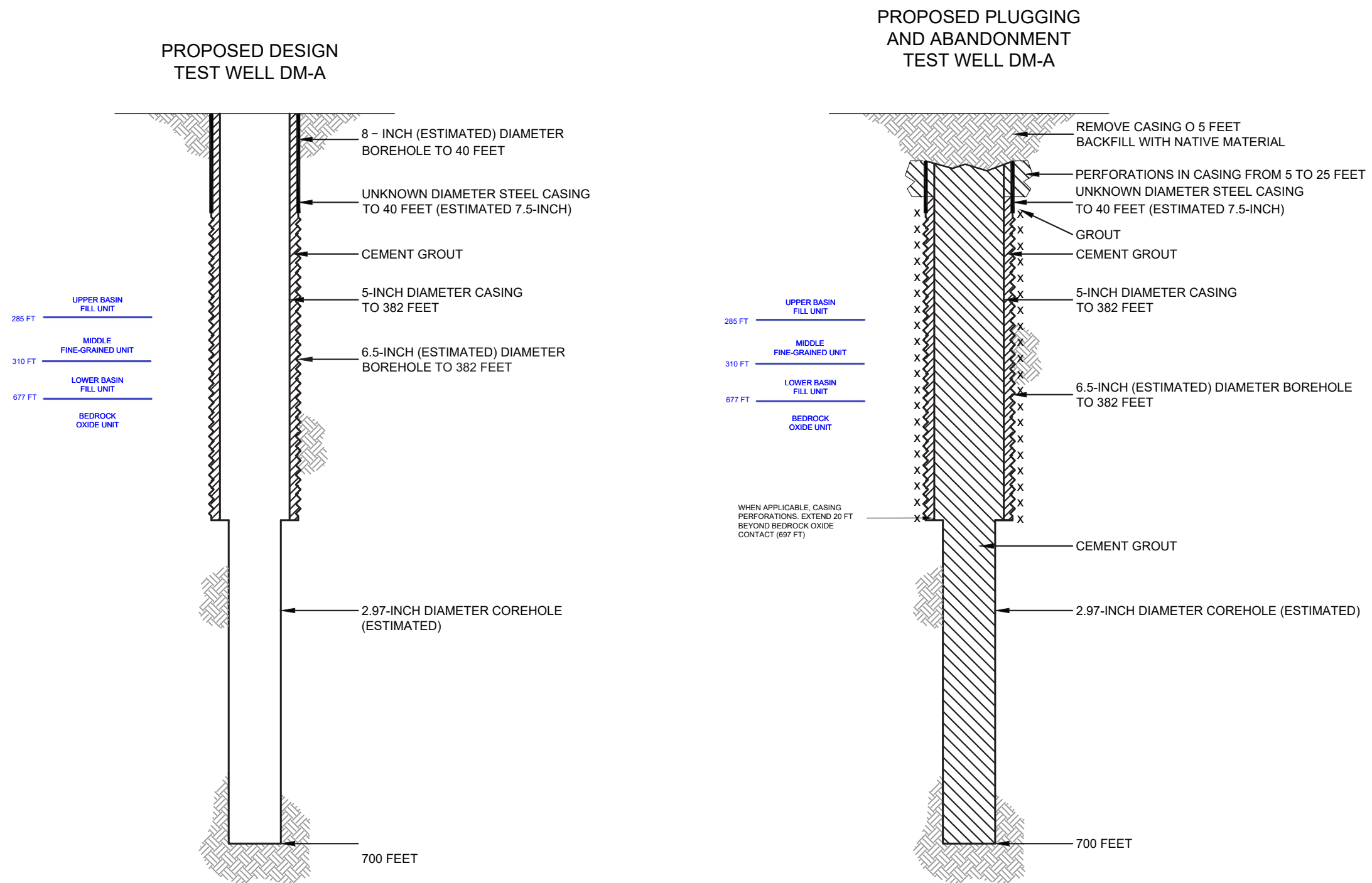
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



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FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC
TEST WELL DM-A



NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

DM-C

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05092827

Surface Location

NW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4265146

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the planned clean-out depth to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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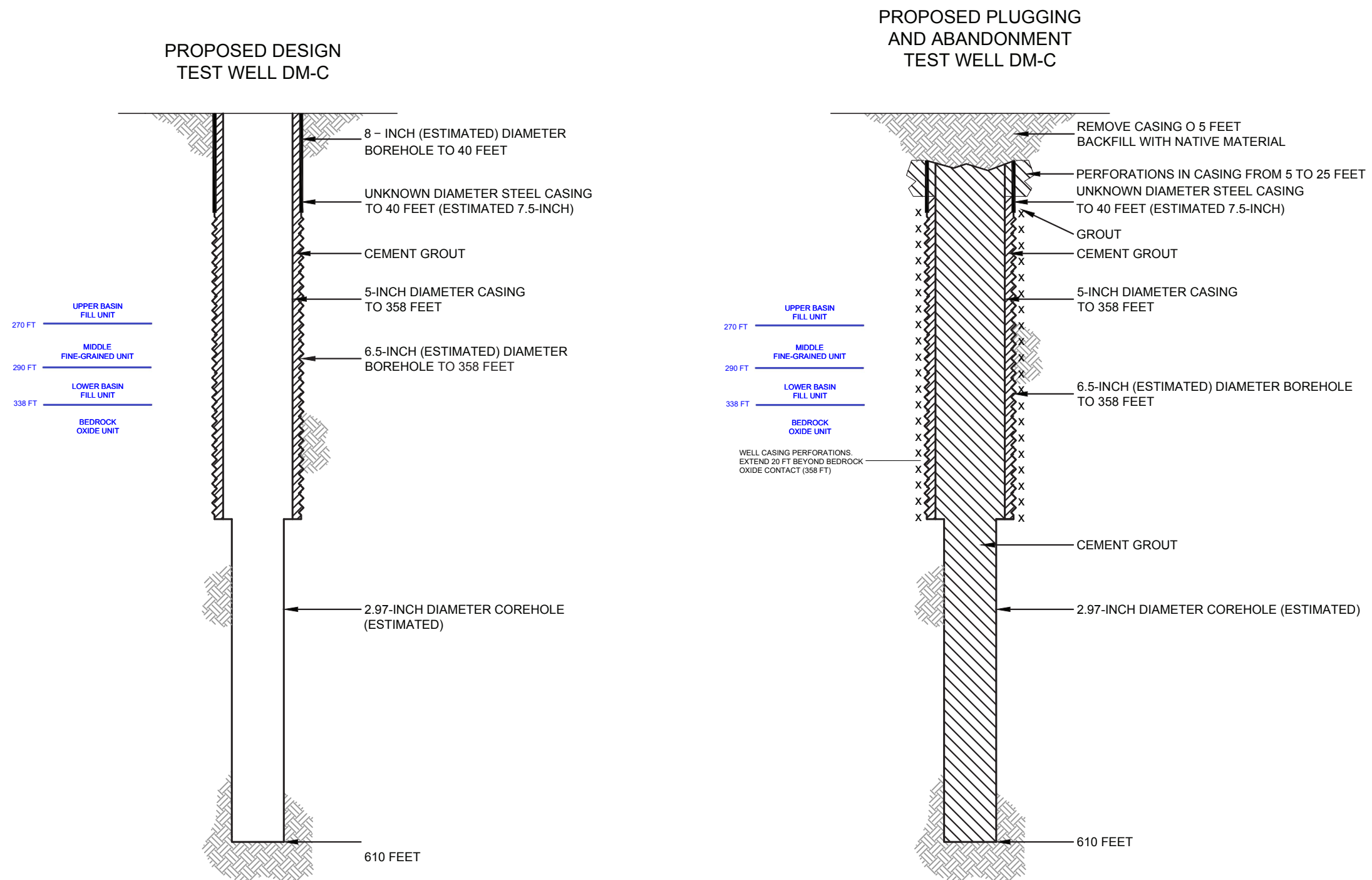
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CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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FLORENCE, ARIZONA

**ABANDONMENT SCHEMATIC
TEST WELL DM-C**



NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

DM-D

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05219116

Surface Location

NW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4279603

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
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☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

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Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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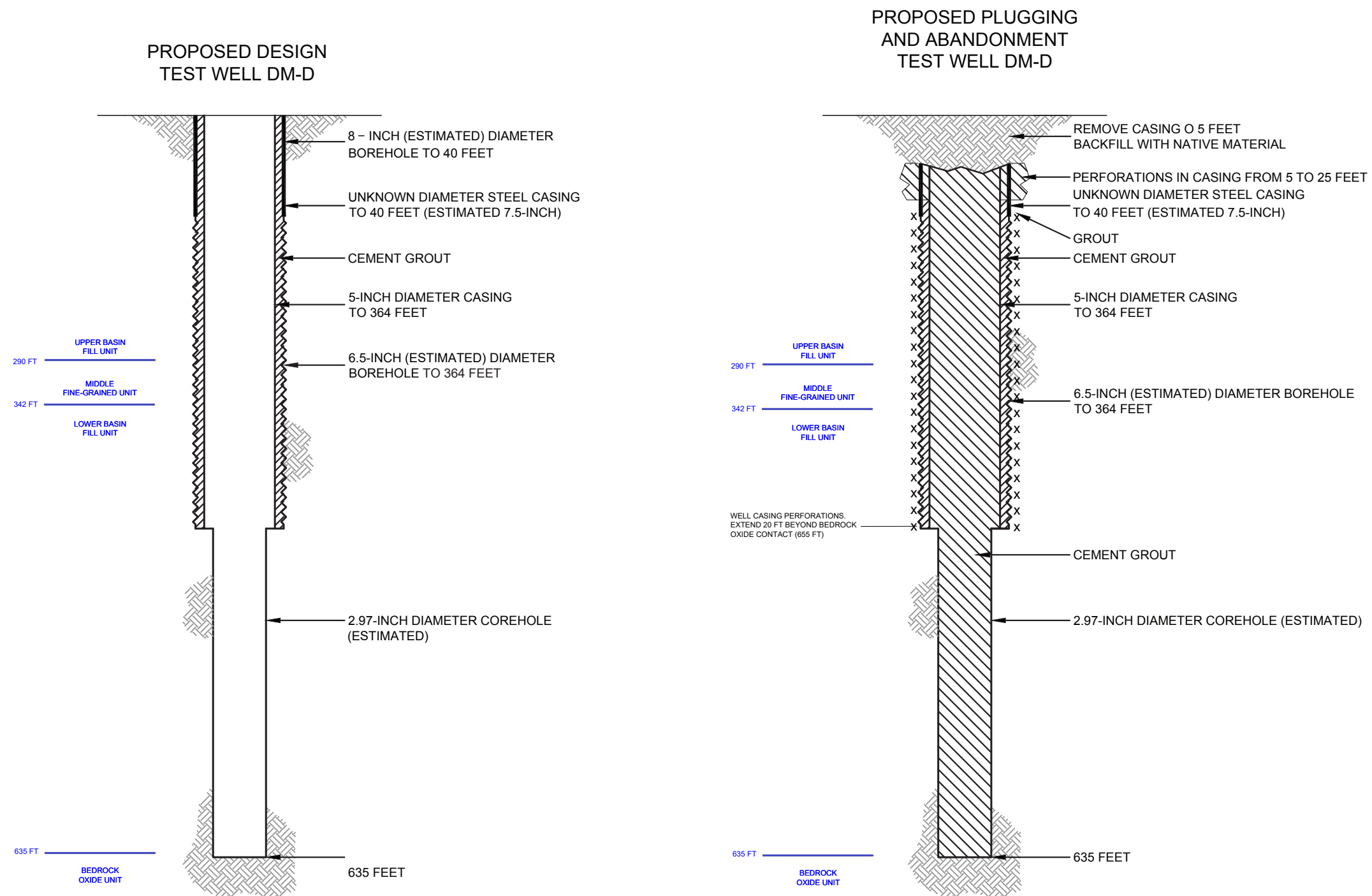
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FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC
TEST WELL DM-D



NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

United States Environmental Protection Agency



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Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

DM-E

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04853319

Surface Location

SE 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4247131

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
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TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

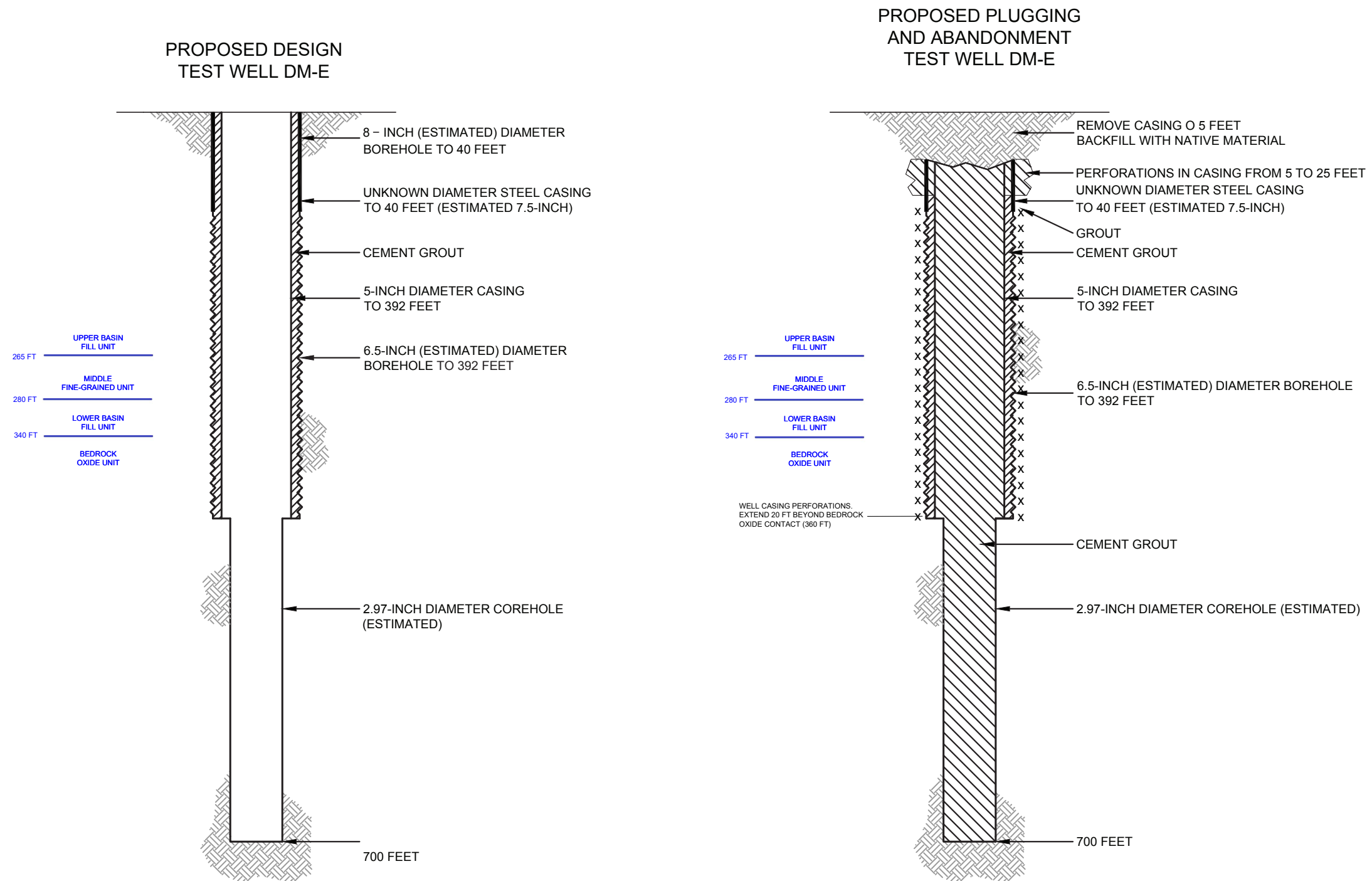
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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

M1-GL

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.0438472

Surface Location

NE 1/4 of NW 1/4 of Section 33 Township 4S Range 9E

Longitude -111.432049

 ft. from (N/S) Line of quarter section

 ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
 Date Expected to Commence March 2021

- ☐ Report After Work
 Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the planned clean-out depth to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

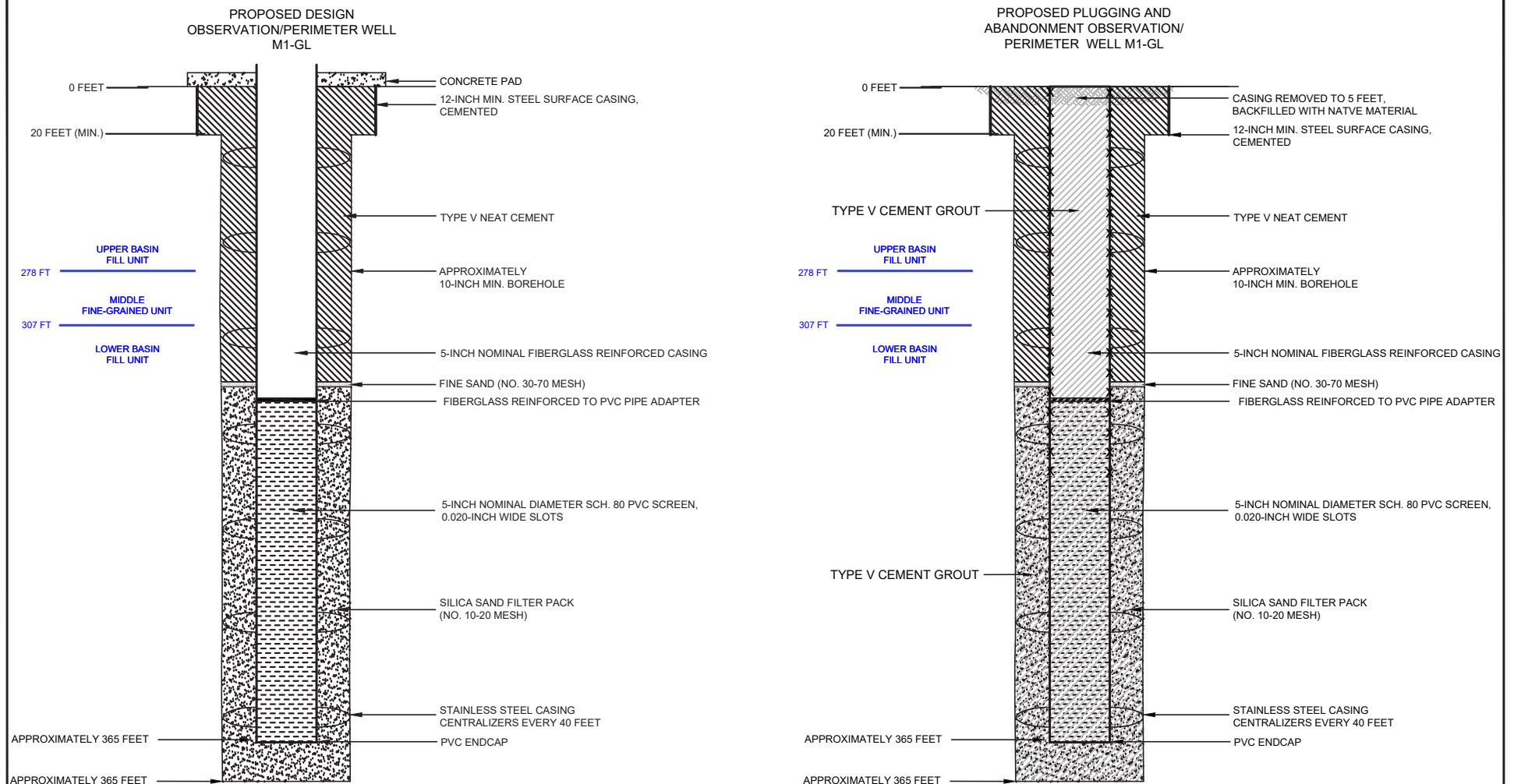
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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL M1-GL

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

M2-GU

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04363387

Surface Location

NE 1/4 of NE 1/4 of Section 33 Township 4S Range 9E

Longitude -111.4217481

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the planned clean-out depth to enable placement of cement seals.

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A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

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API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

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Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

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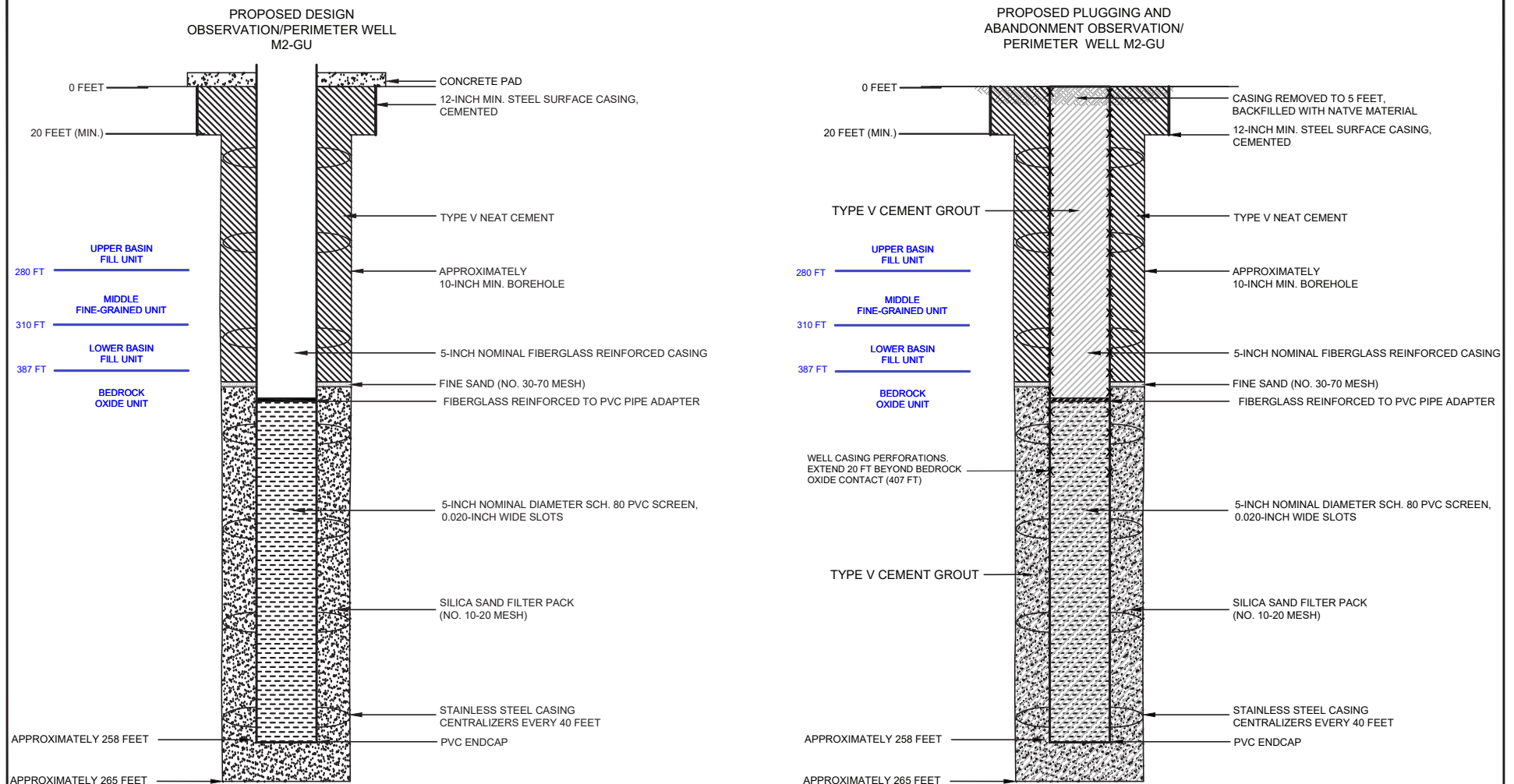
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NOTES

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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL M2-GU

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

M3-GL

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.0434904

Surface Location

NE 1/4 of NE 1/4 of Section 33 Township 4S Range 9E

Longitude -111.4218194

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
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10/3/2019

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For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

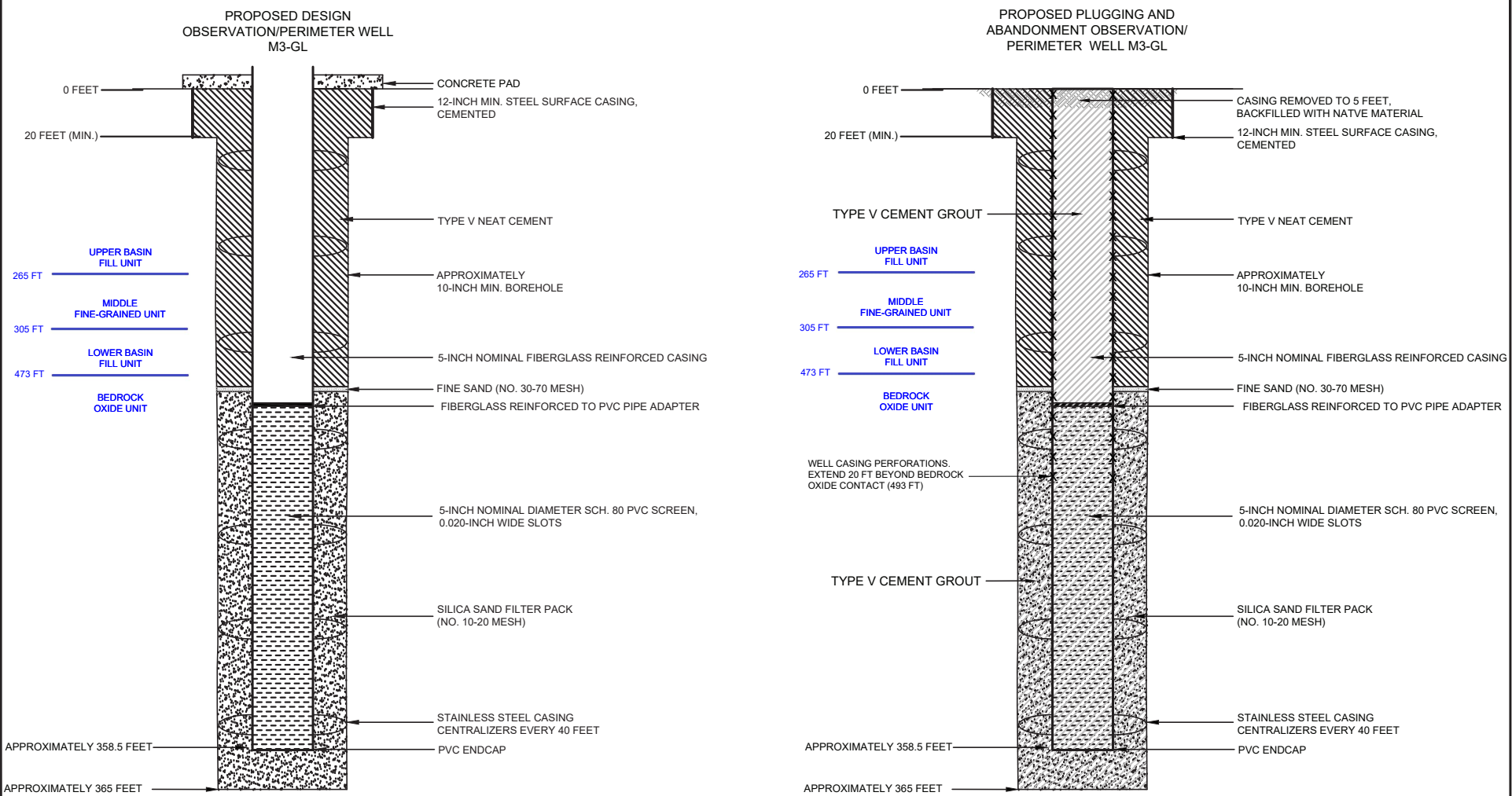
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

**ABANDONMENT SCHEMATIC
OBSERVATION/PERIMETER
WELL M3-GL**

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

M4-O

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04357783

Surface Location

NE 1/4 of NE 1/4 of Section 33 Township 4S Range 9E

Longitude -111.4218242

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the planned clean-out depth to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

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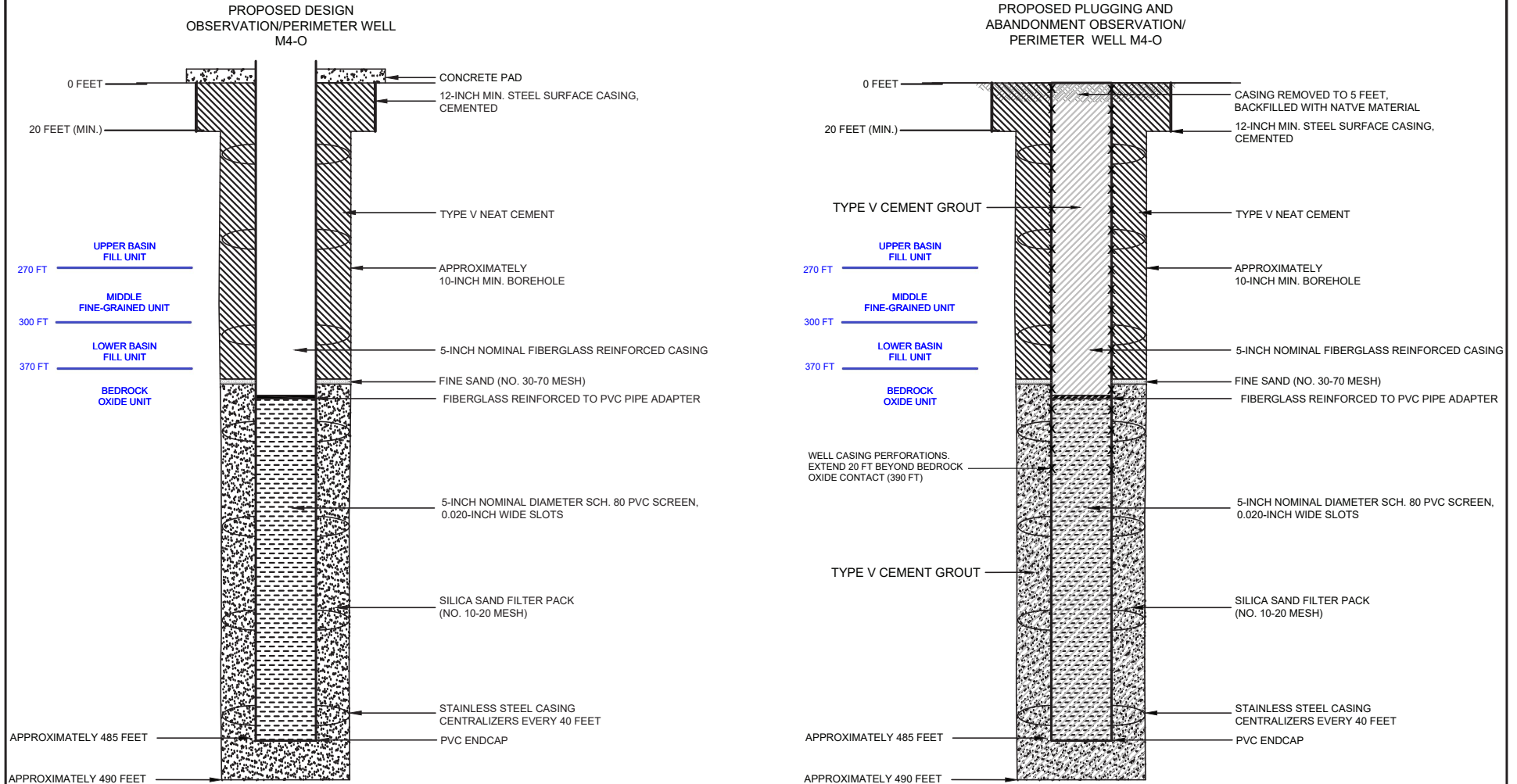
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NOTES

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ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL M4-O

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

M5-S

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04358295

Surface Location

NE 1/4 of NE 1/4 of Section 33 Township 4S Range 9E

Longitude -111.42166

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the planned clean-out depth to enable placement of cement seals.

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A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

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I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

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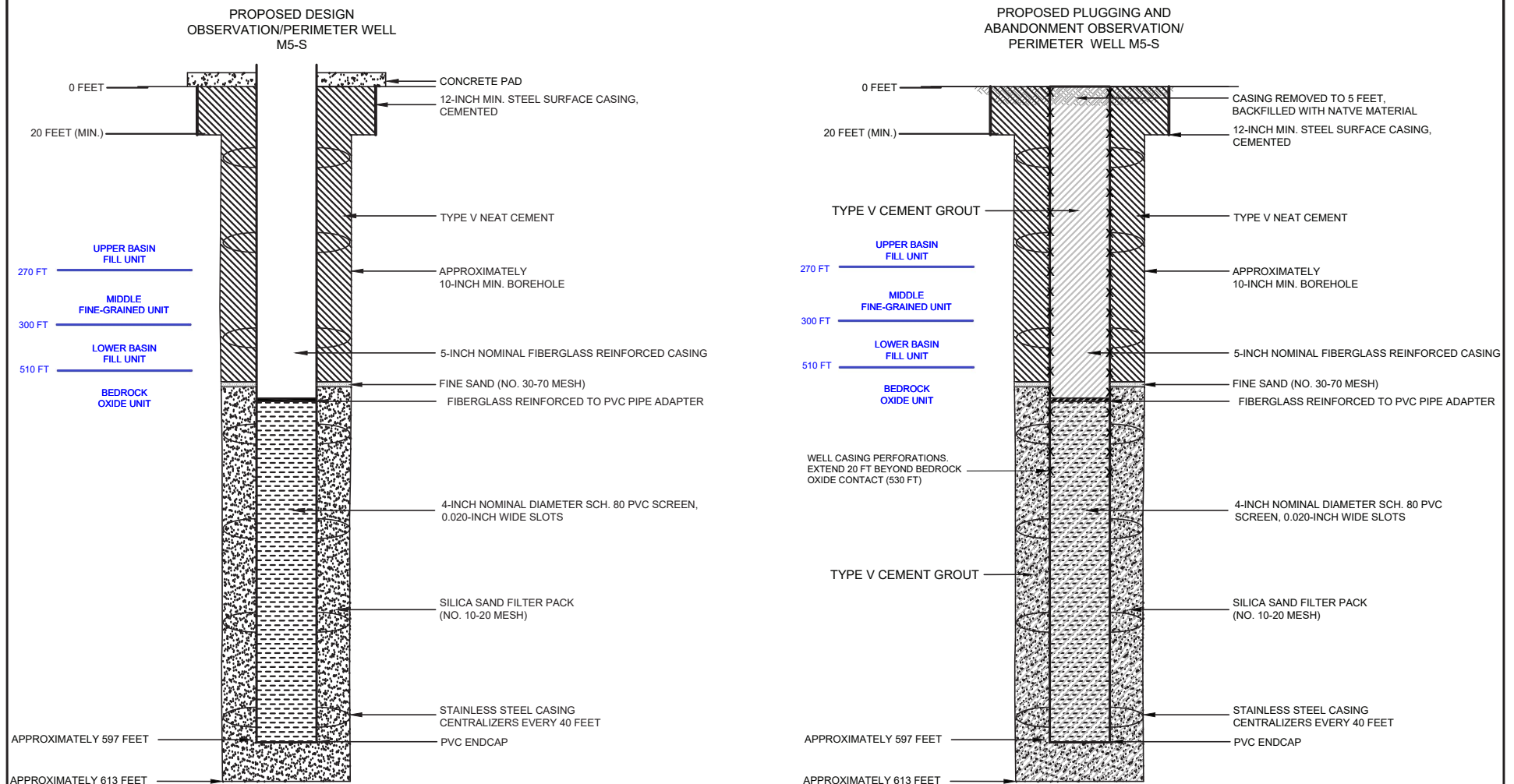
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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL M5-S

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

M6-GU

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05418567

Surface Location

SW 1/4 of NW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4360545

 ft. from (N/S) Line of quarter section

 ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
 Date Expected to Commence March 2021
☐ Report After Work
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- ☐ Well Rework
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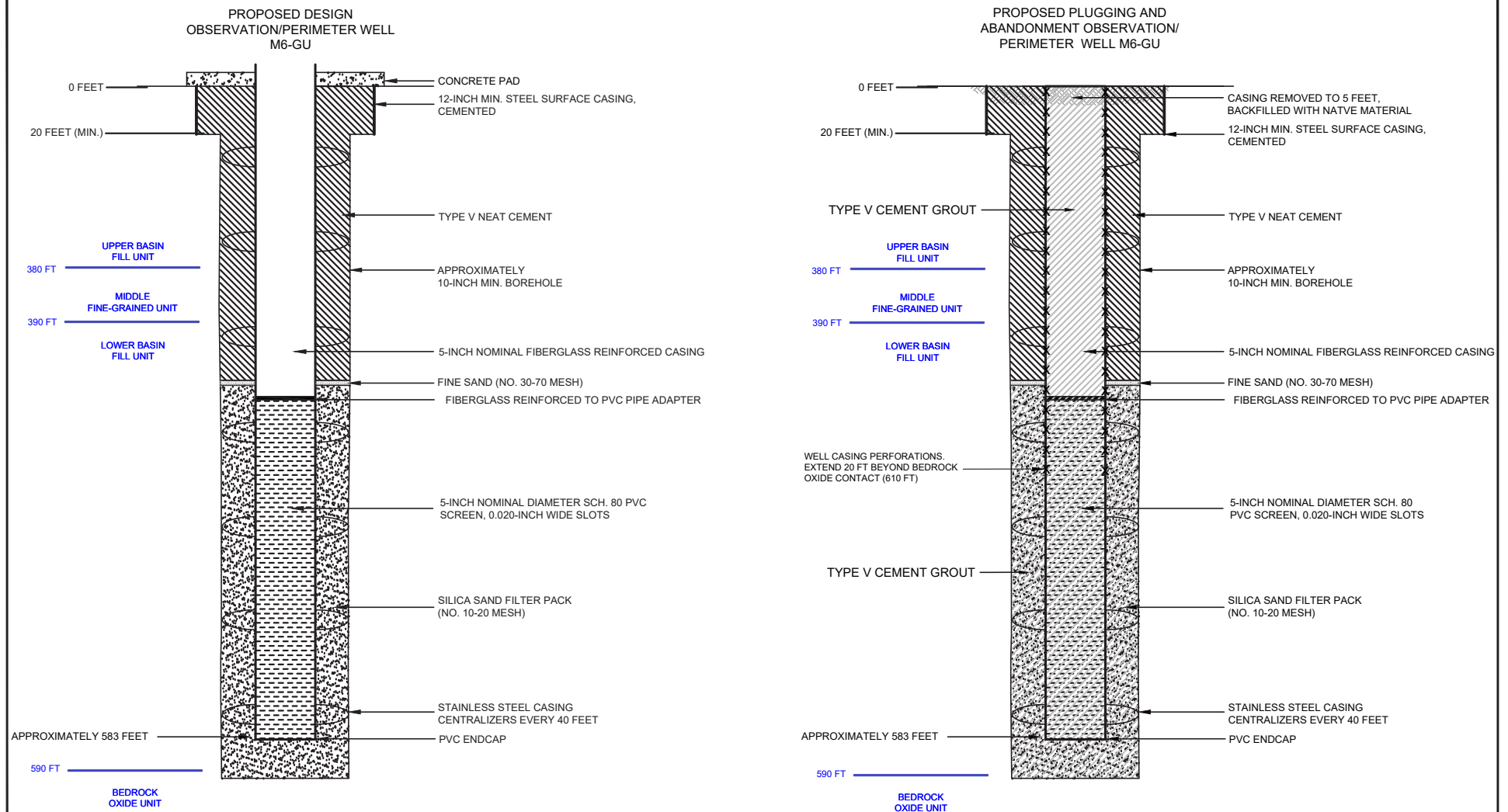
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL M6-GU

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

M7-GL

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05411719

Surface Location

SW 1/4 of NW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4359722

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the planned clean out depth to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

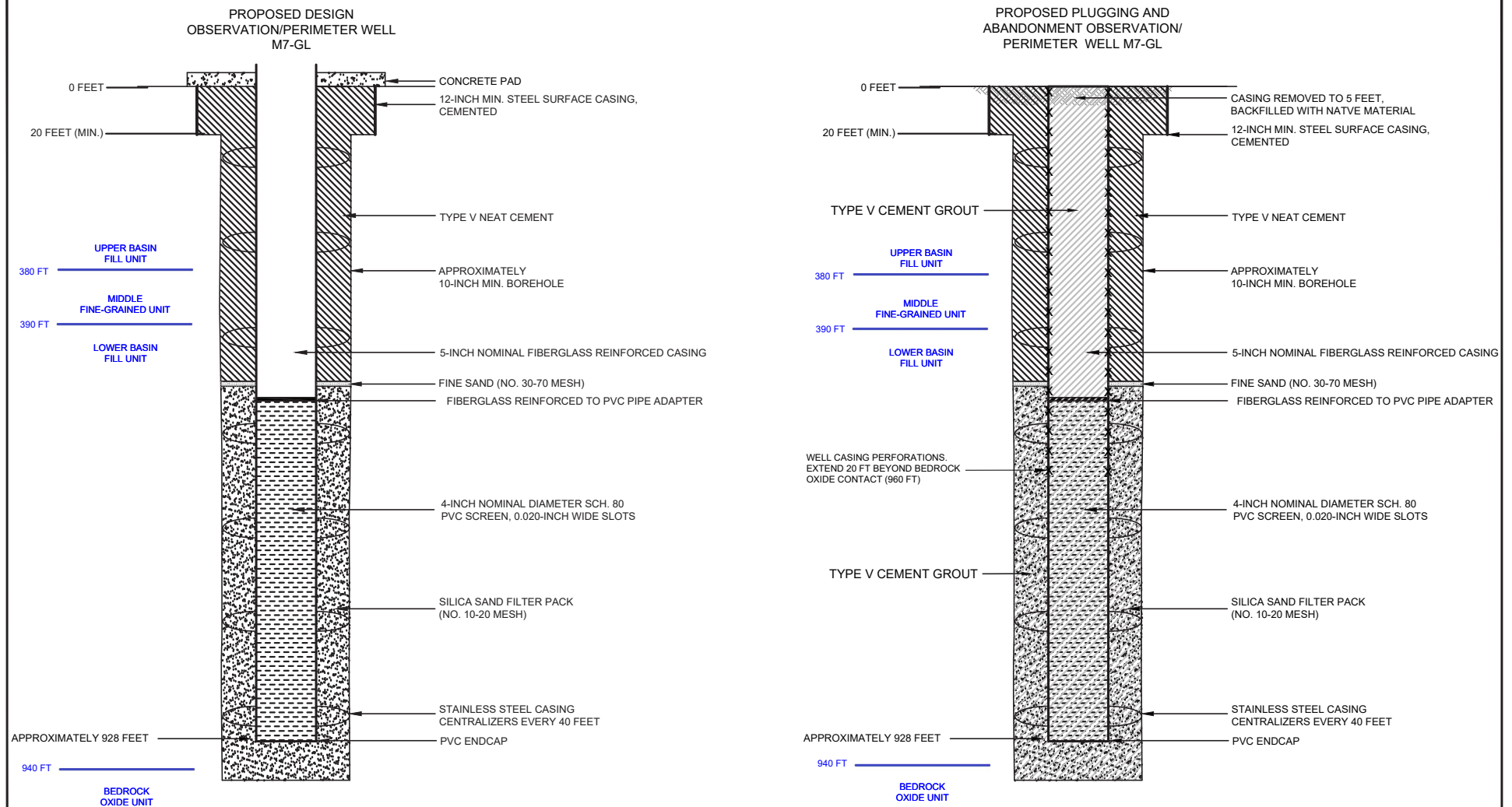
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NOTES

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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL M7-GL

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

M8-O

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05409613

Surface Location

SW 1/4 of NW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4361414

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the planned clean out depth to enable placement of cement seals.

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A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

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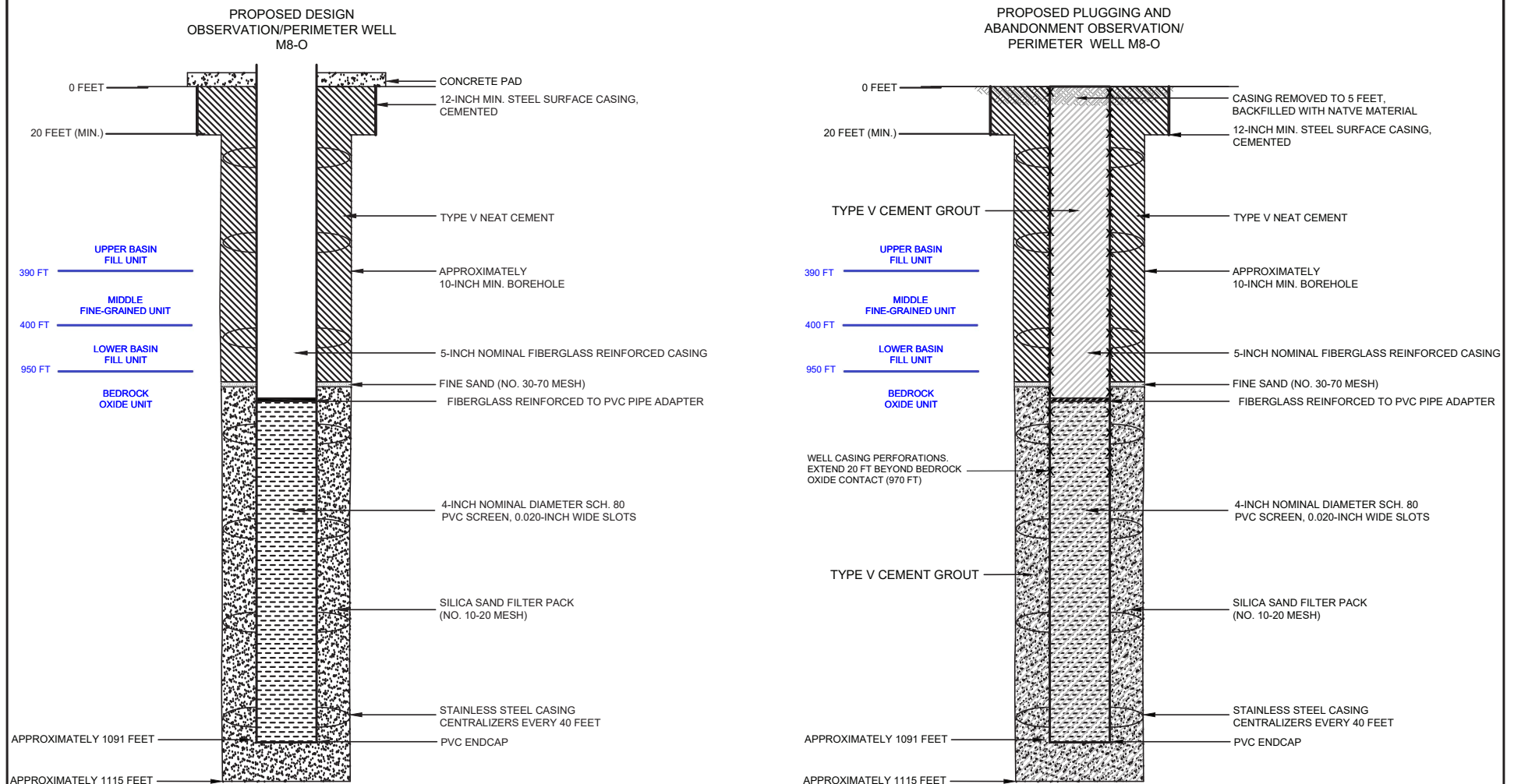
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NOTES

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**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL M8-O

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

M9-S

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05418464

Surface Location

SW 1/4 of NW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4362154

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
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- ☐ Well Rework
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Dan Johnson, VP - General Manager

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10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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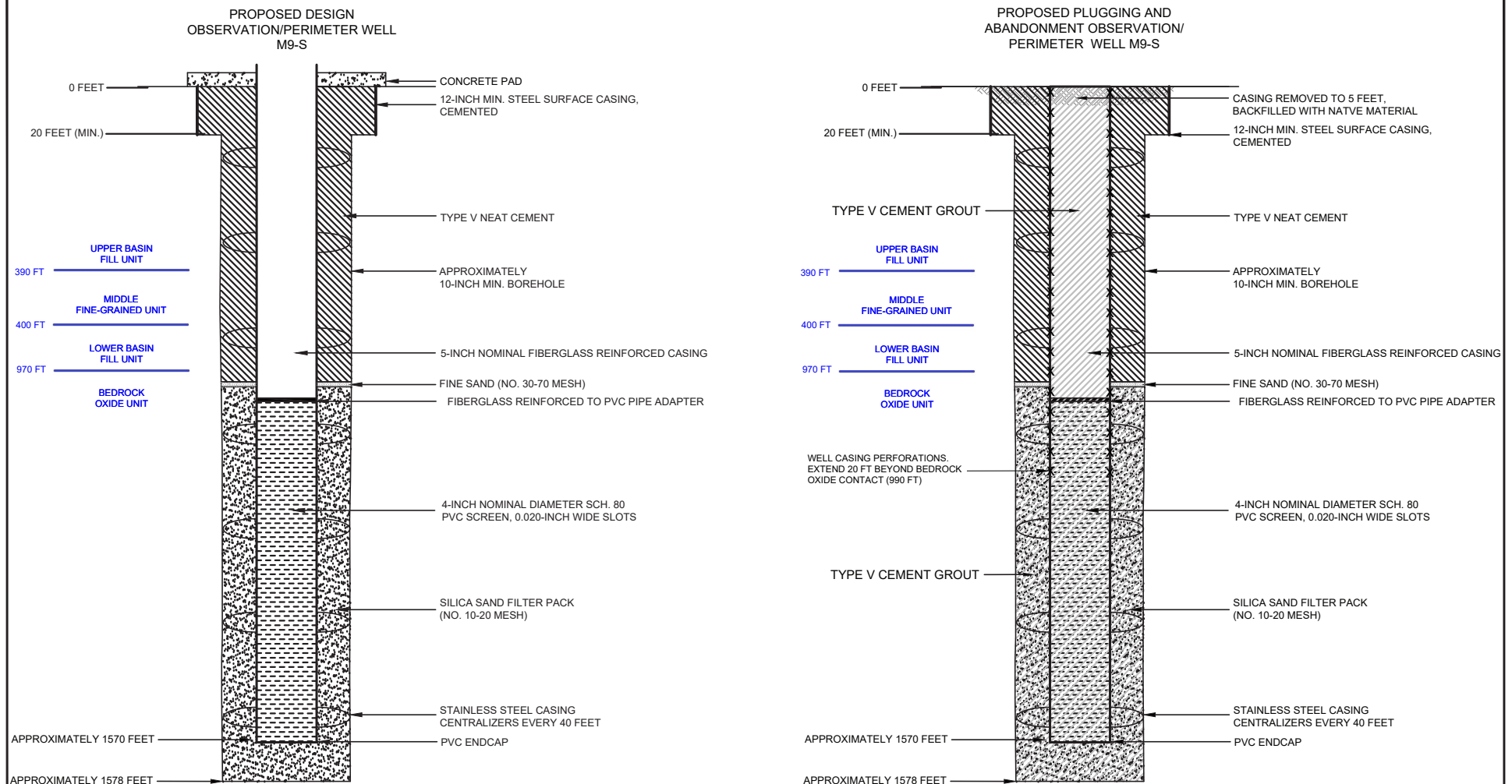
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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

**HALEY
ALDRICH**

FLORENCE COPPER, INC.
 FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL M9-S

SEPTEMBER 2019
 SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

M10-GU

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04841171

Surface Location

SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4277919

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the planned clean out depth to enable placement of cement to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

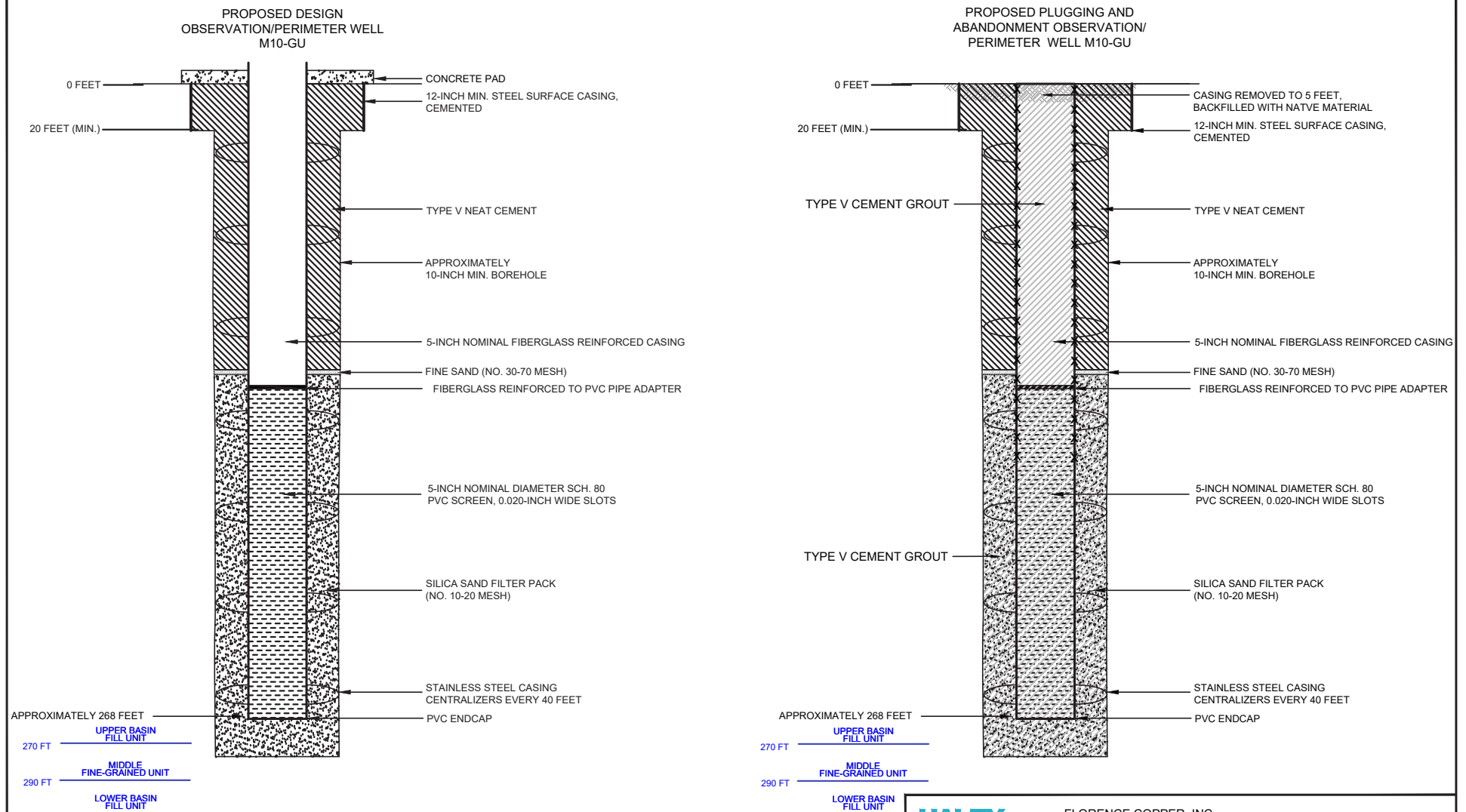
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**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL M10-GU

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
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Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

M11-GL

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04842387

Surface Location

SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4279501

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

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Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

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Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

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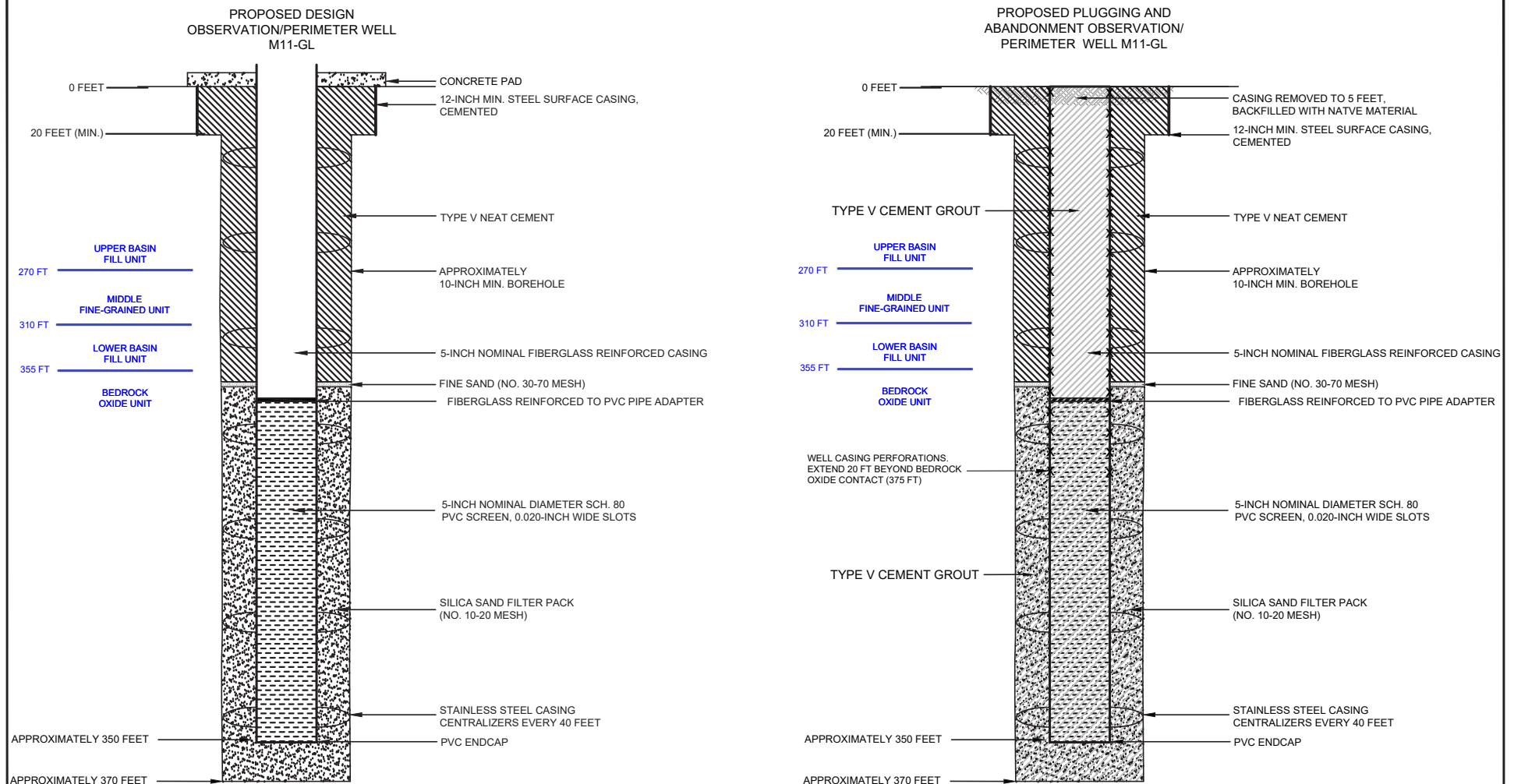
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**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL M11-GL

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

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Full Well Name

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State

Arizona

County

Pinal

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Latitude 33.0485178

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ft. from (N/S) Line of quarter section

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Type of Action (pick one)

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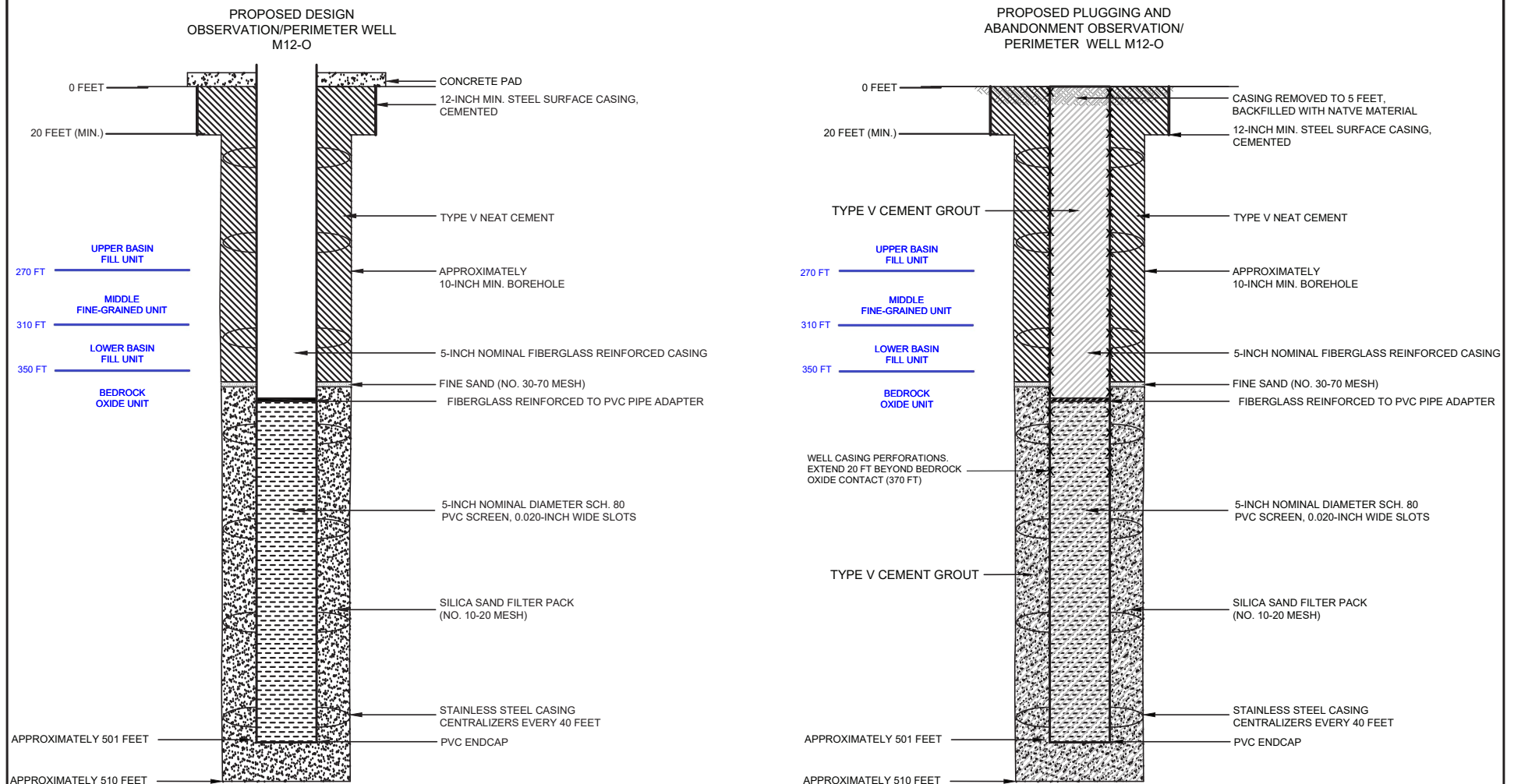
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CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL M12-O

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

M13-S

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04852256

Surface Location

SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4279525

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the planned clean out depth to enable placement of cement to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

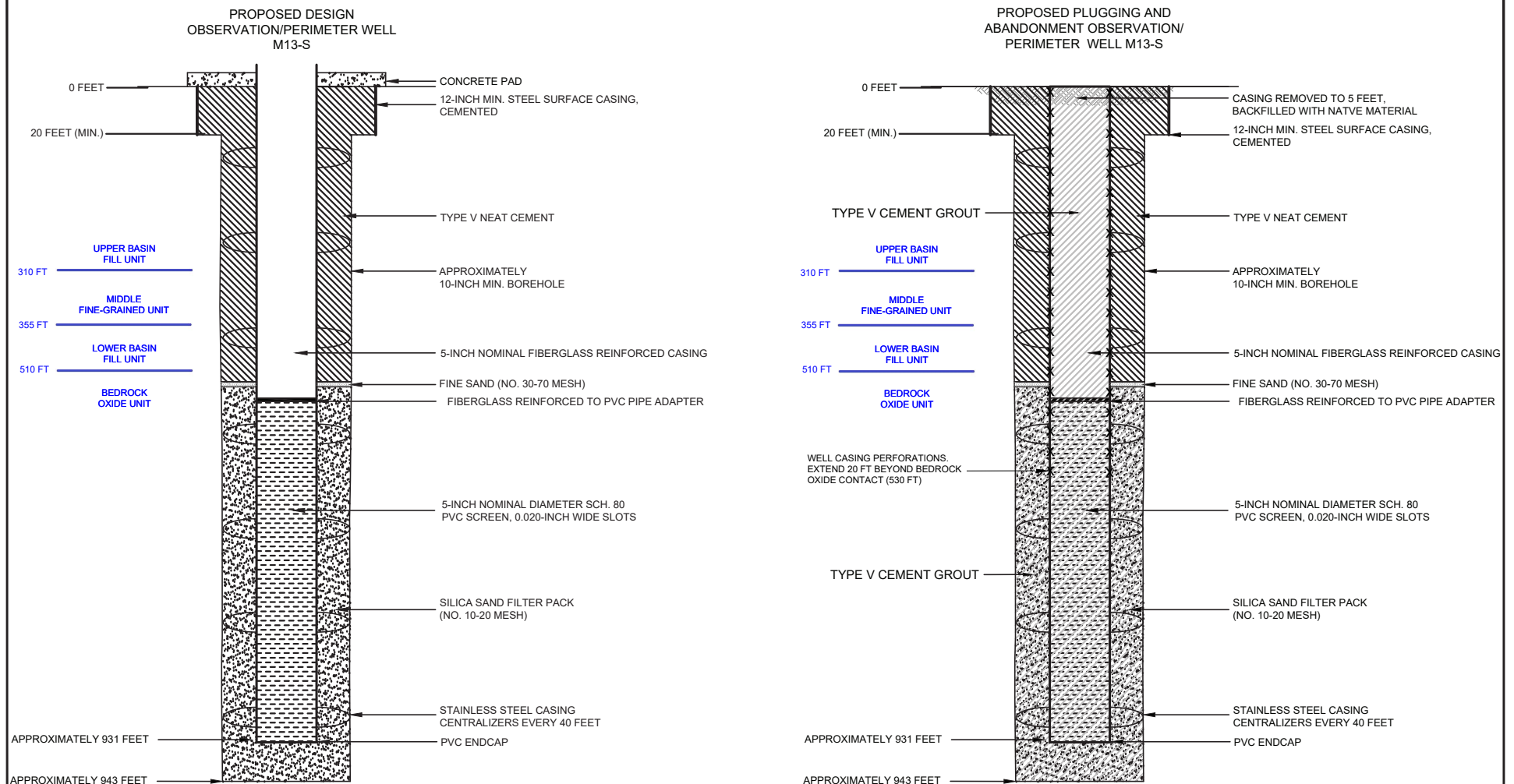
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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NOTES

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**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL M13-S

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

M14-GL

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05105108

Surface Location

NW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4370365

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the planned clean out depth to enable placement of cement to enable placement of cement seals.

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If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

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FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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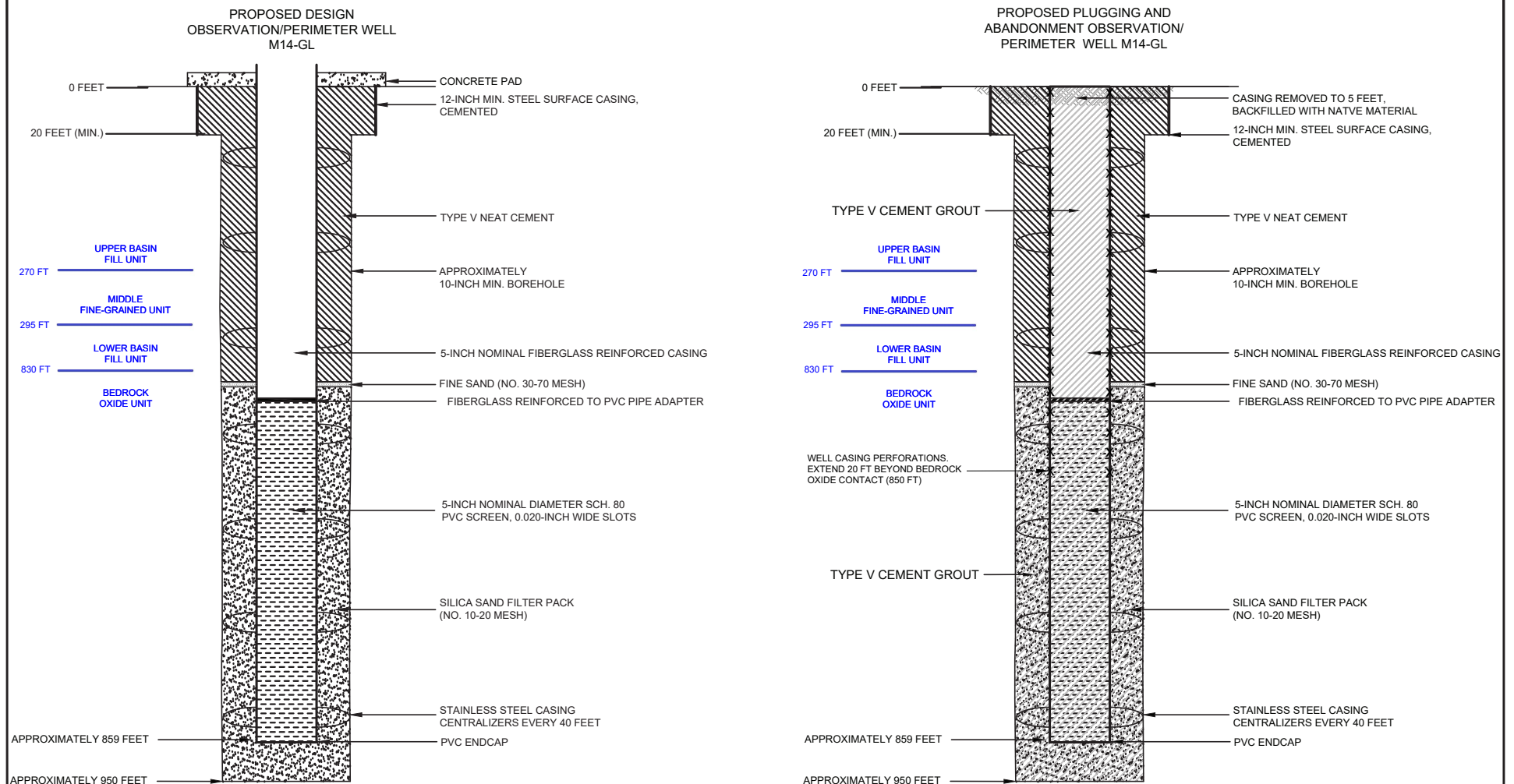
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**HALEY
ALDRICH**

FLORENCE COPPER, INC.
 FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL M14-GL

SEPTEMBER 2019
 SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

M15-GU

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05106082

Surface Location

NW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4372098

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

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Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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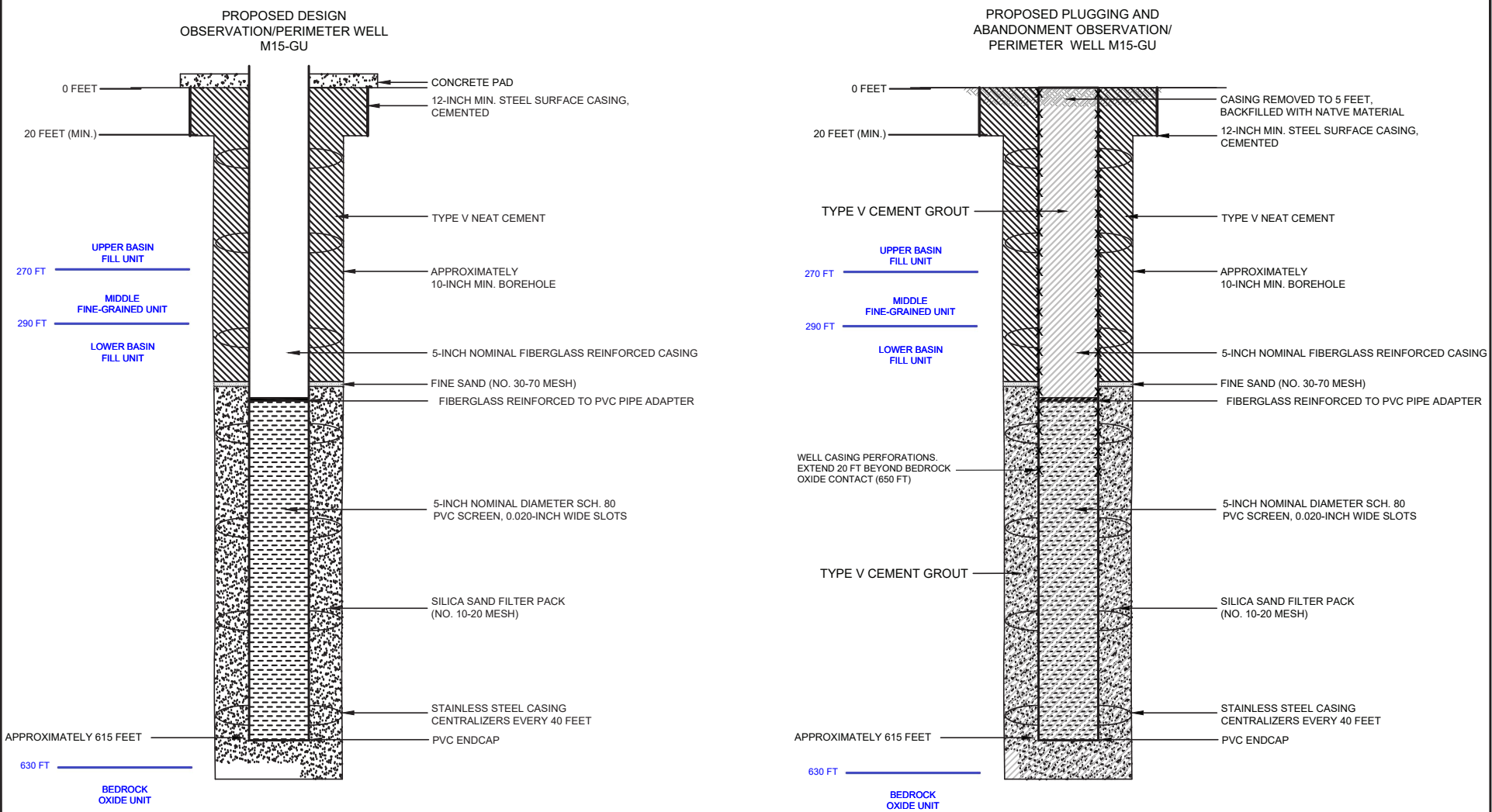
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PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

**ABANDONMENT SCHEMATIC
OBSERVATION/PERIMETER
WELL M15-GU**

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

M16-GU

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04735103

Surface Location

SW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4373562

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the planned clean out depth to enable placement of cement to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

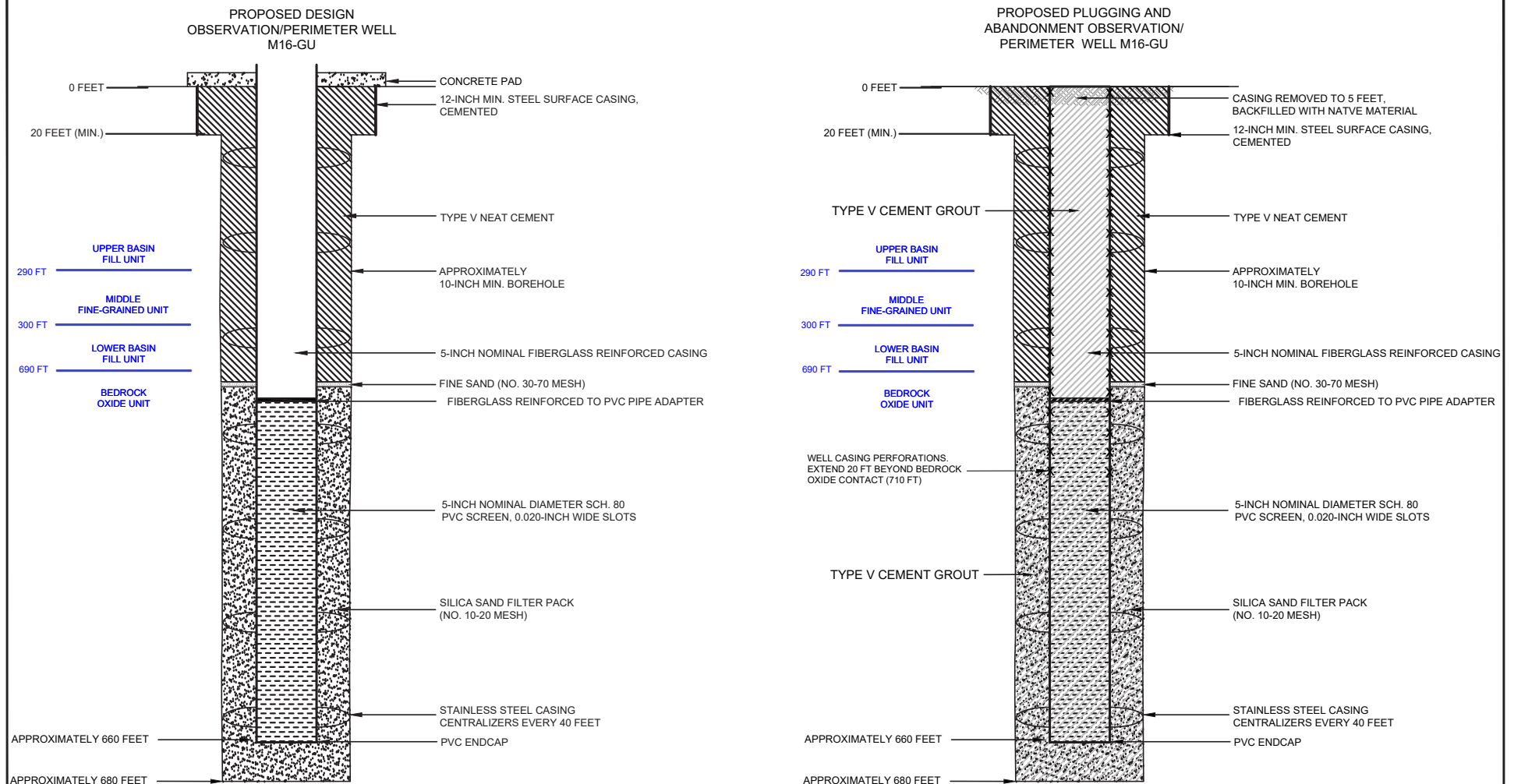
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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL M16-GU

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

M17-GL

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04709823

Surface Location

SW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4368759

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

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Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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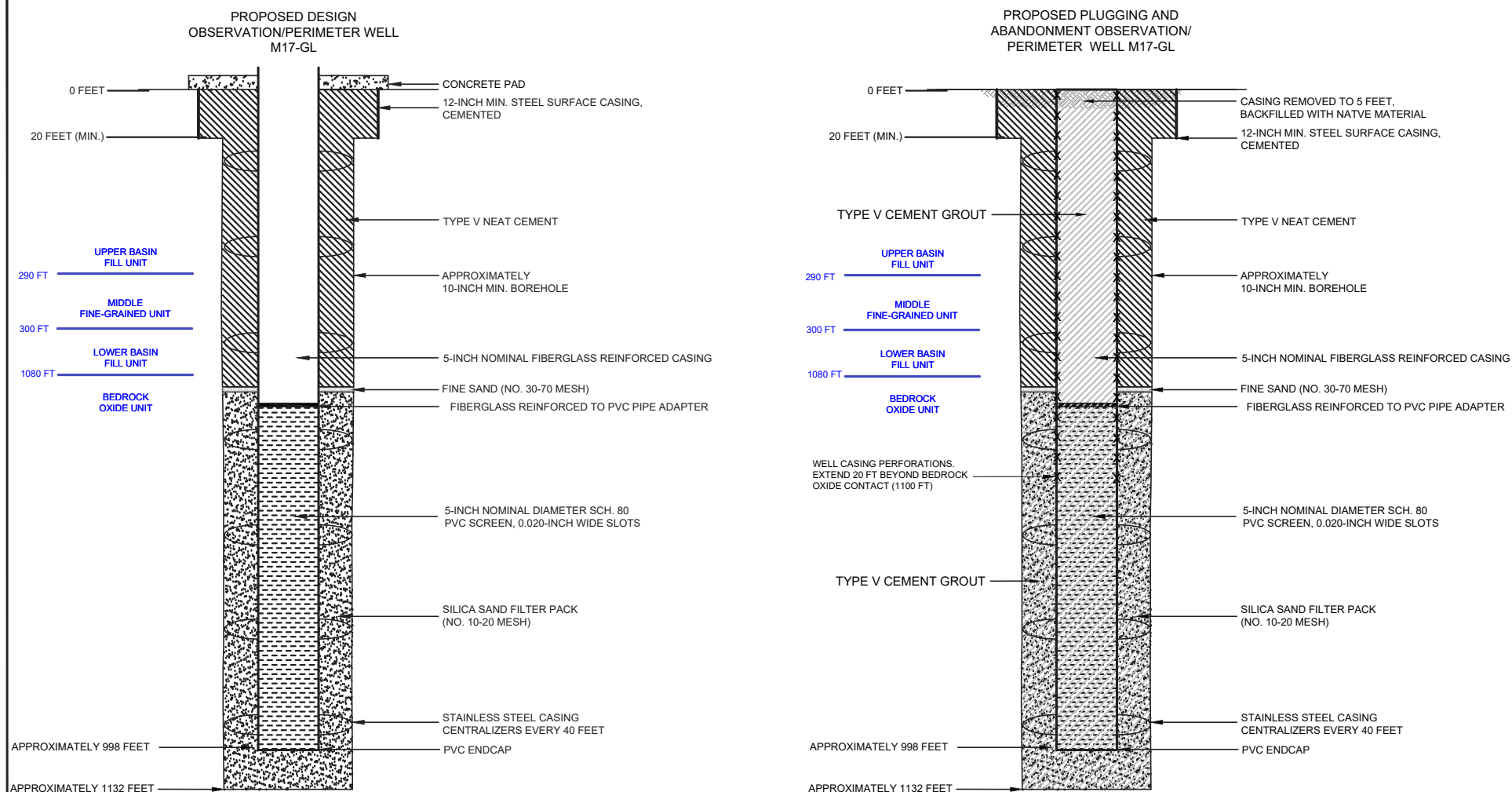
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**HALEY
ALDRICH**

FLORENCE COPPER, INC.
 FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL M17-GL

SEPTEMBER 2019
 SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

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Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

M18-GU

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.0438472

Surface Location

NE 1/4 of NW 1/4 of Section 33 Township 4S Range 9E

Longitude -111.432049

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

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☐ Class II
☒ Class III
☐ Class V

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Date Expected to Commence March 2021

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Signature

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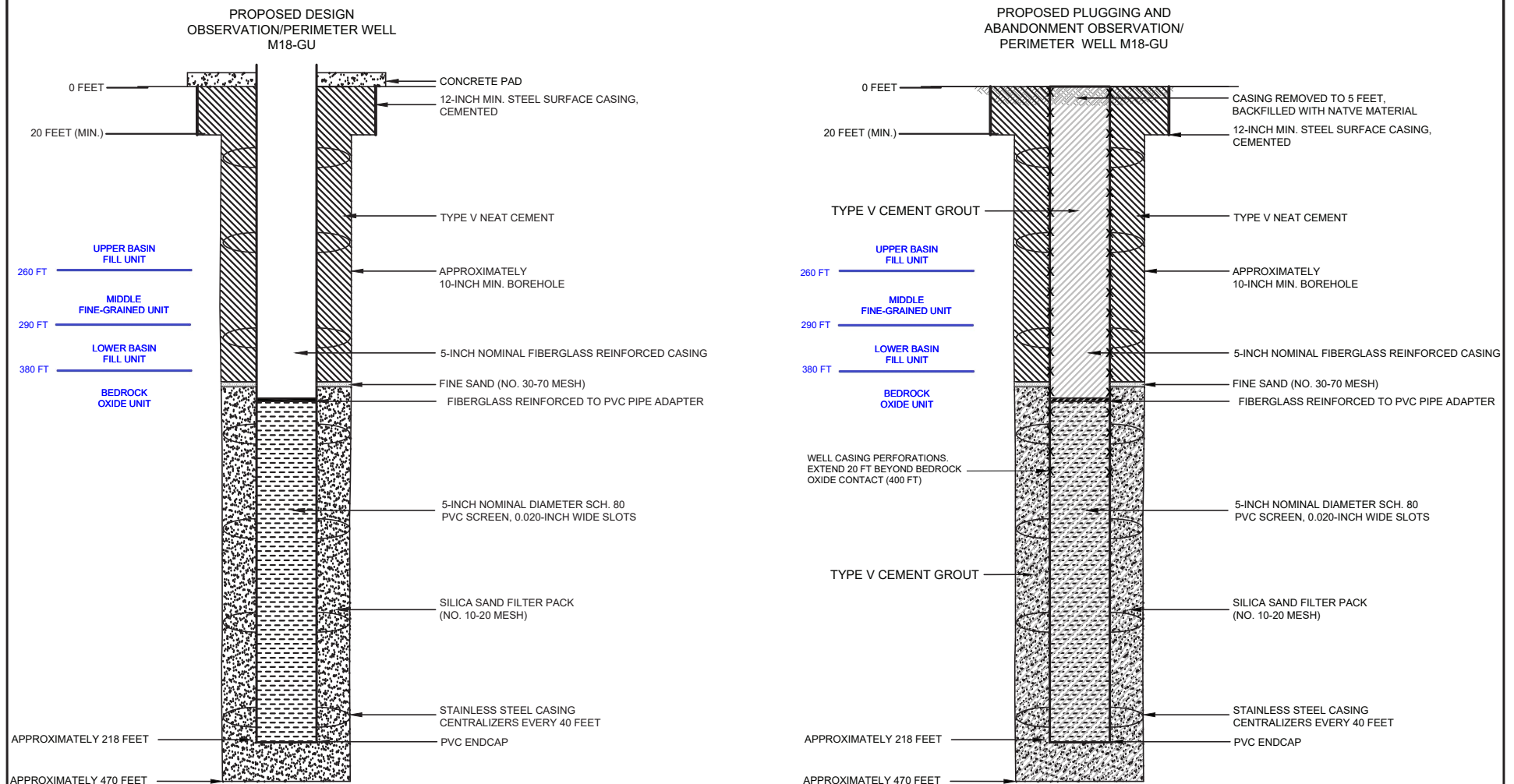
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PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL M18-GU

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

M19-LBF

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05368298

Surface Location

SE 1/4 of NW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4304606

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the planned clean out depth to enable placement of cement to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

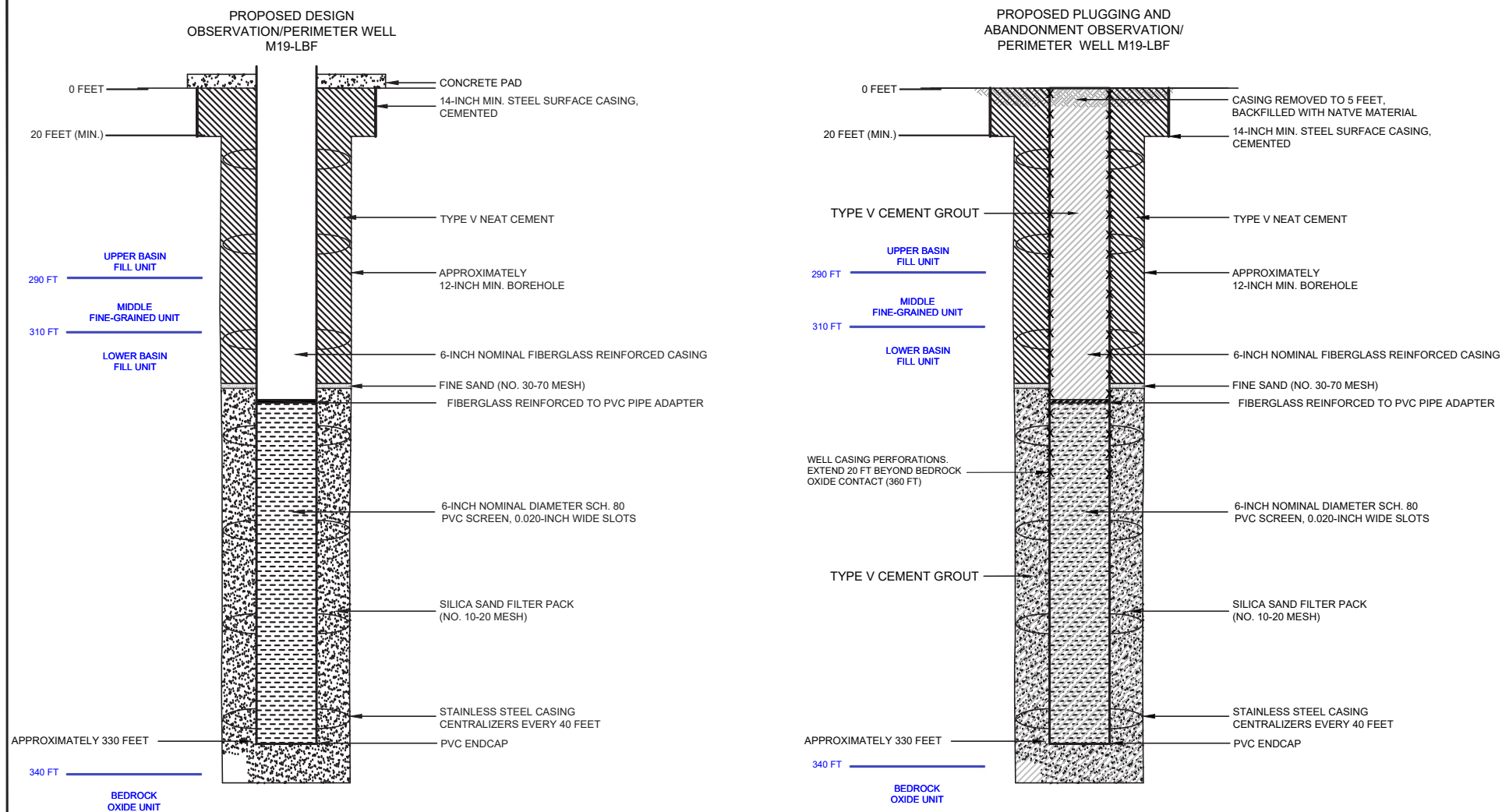
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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NOTES

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FLORENCE COPPER, INC.
 FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL M19-LBF

SEPTEMBER 2019
 SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

M20-O

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05366685

Surface Location

SE 1/4 of NW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4312586

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the planned clean out depth to enable placement of cement to enable placement of cement seals.

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A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

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Certification

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Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

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WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

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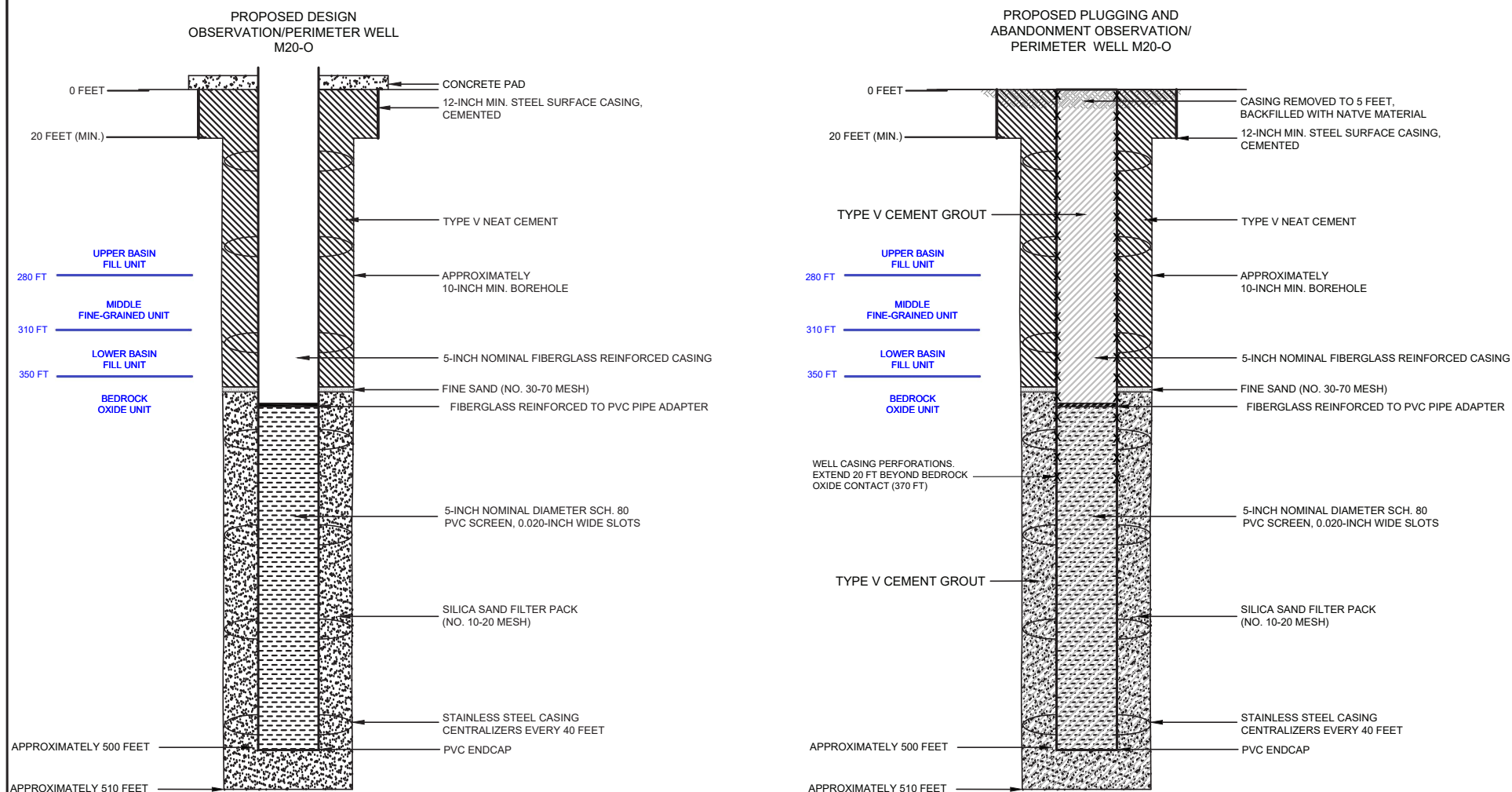
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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL M20-O

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

M21-UBF

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05354314

Surface Location

SE 1/4 of NW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4304767

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
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Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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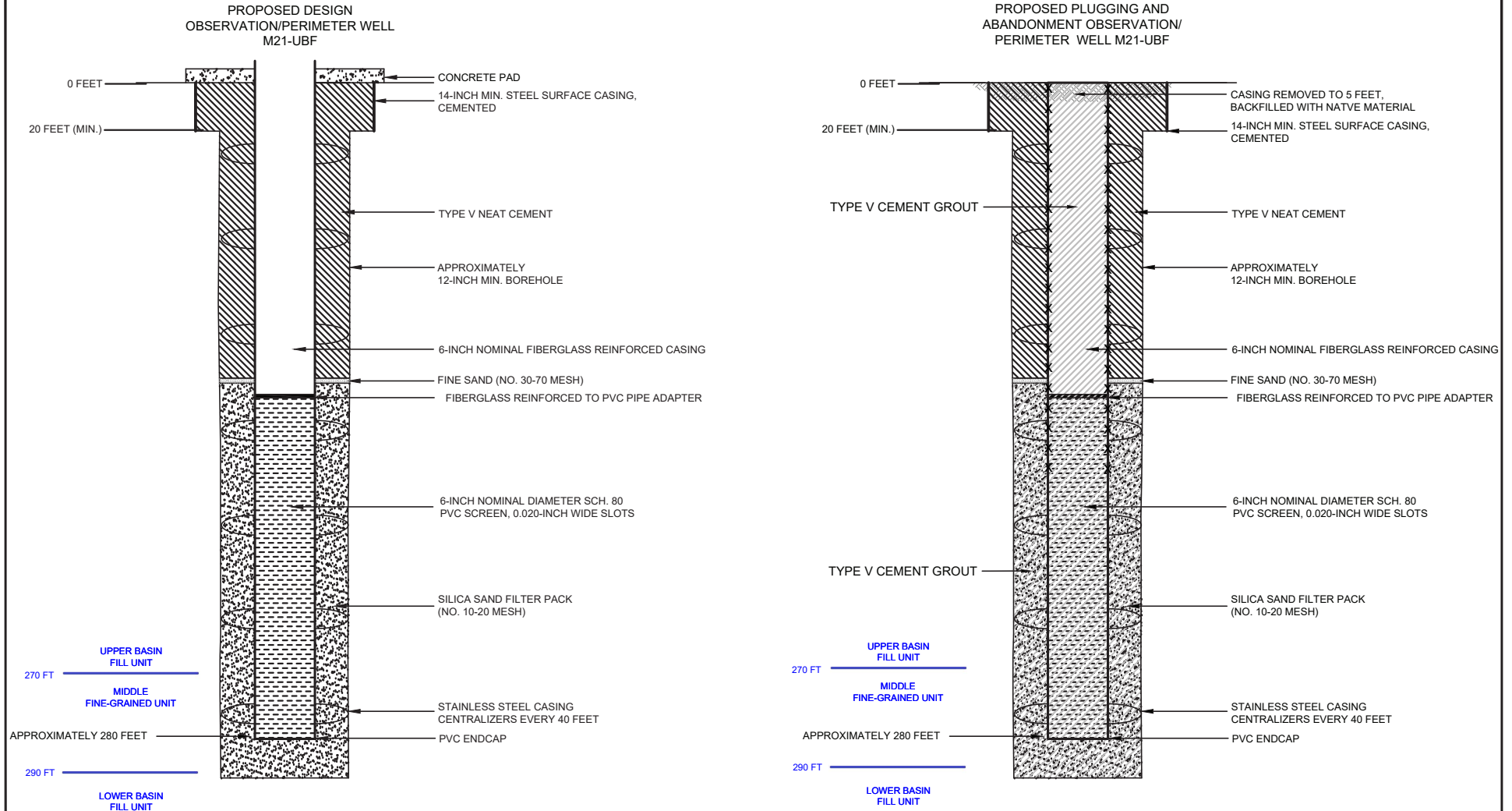
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PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL M21-UBF

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

M22-O

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05119674

Surface Location

NW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4370325

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the planned clean out interval to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

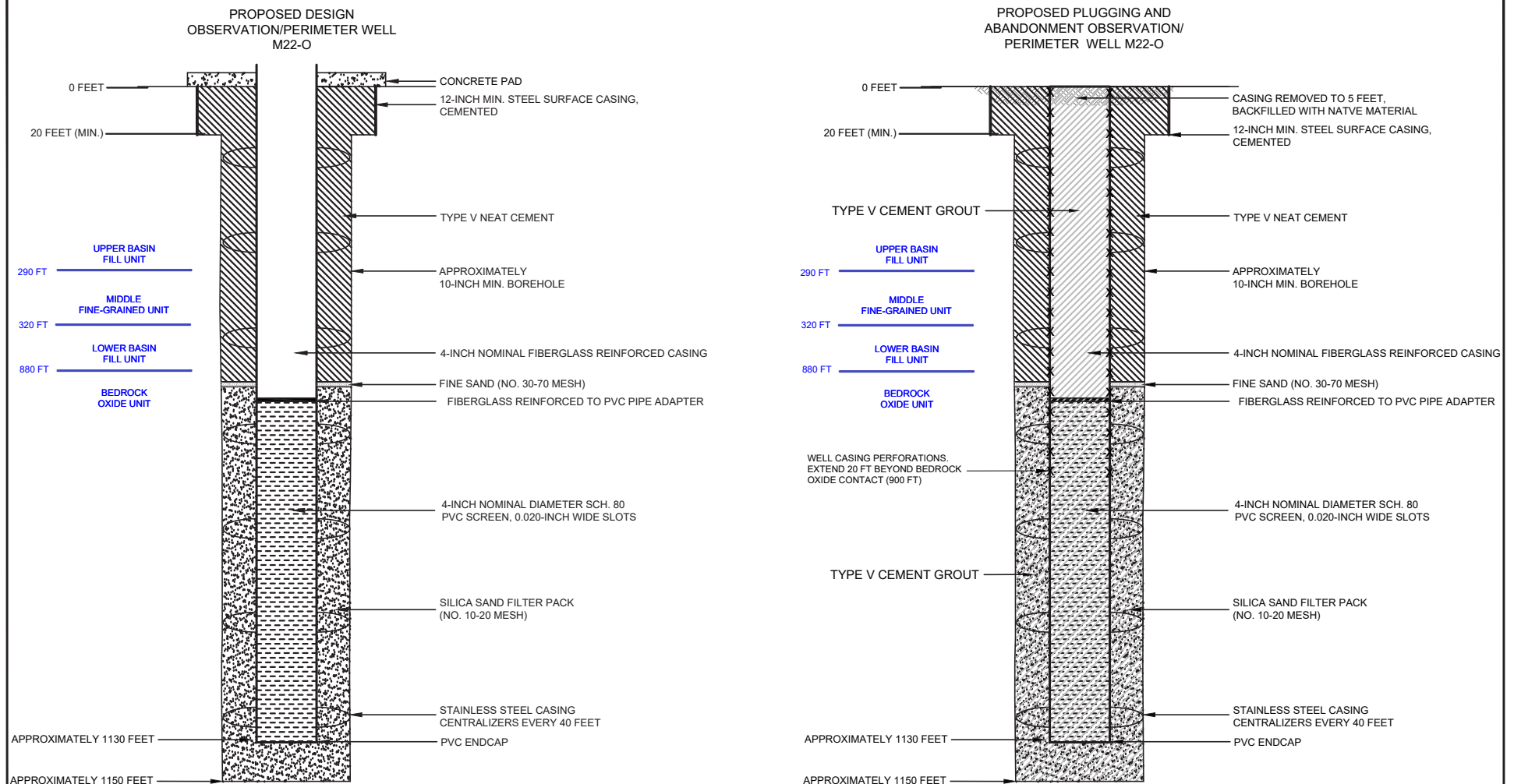
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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NOTES

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**HALEY
ALDRICH**

FLORENCE COPPER, INC.
 FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL M22-O

SEPTEMBER 2019
 SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

M23-UBF

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05119204

Surface Location

NW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4372384

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the planned clean out interval to enable placement of cement seals.

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If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

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WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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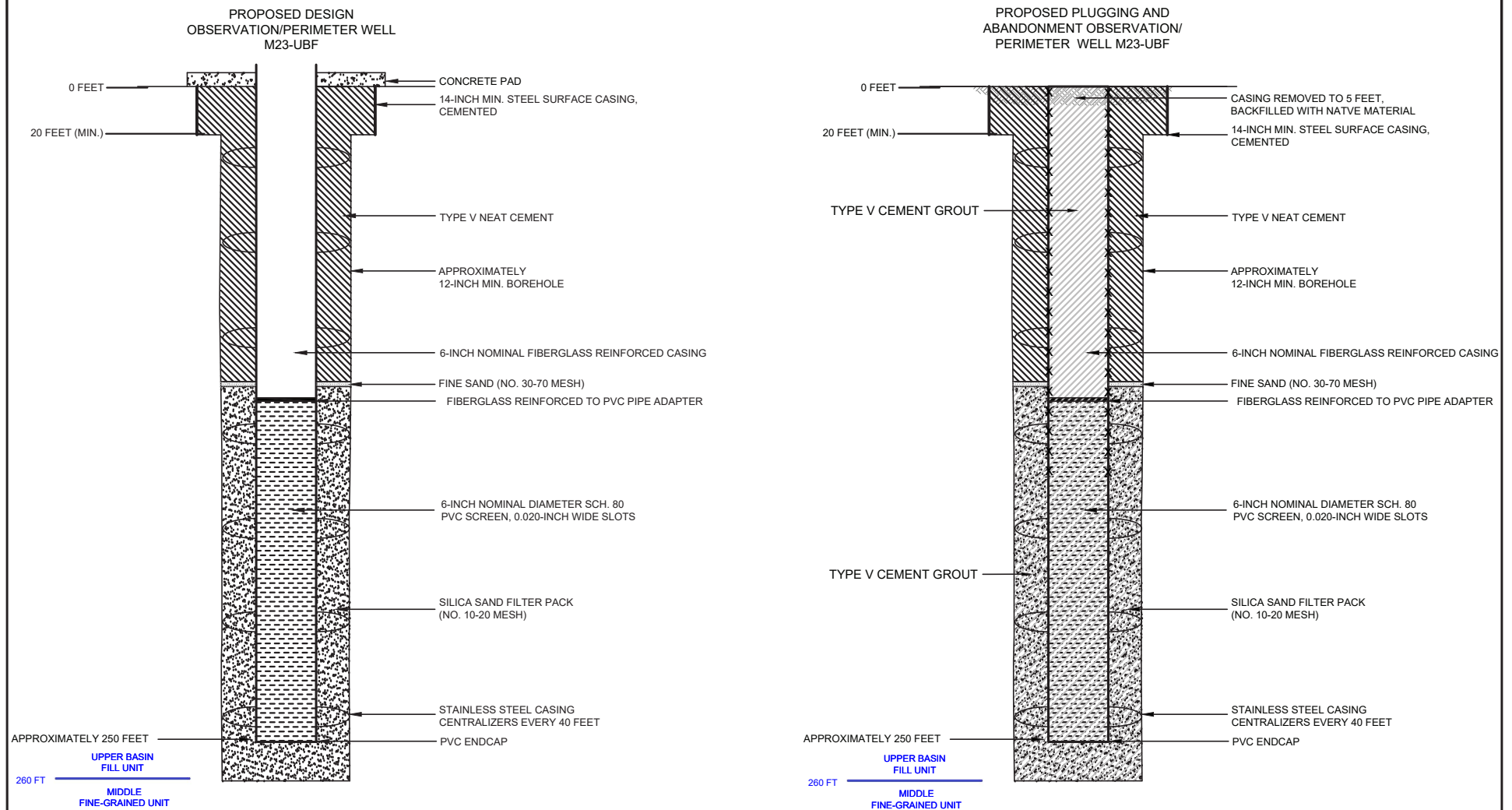
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**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL M23-UBF

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

M24-O

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04830472

Surface Location

SW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.436835

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

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Signature

Date Signed

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INSTRUCTIONS FOR FORM 7520-19

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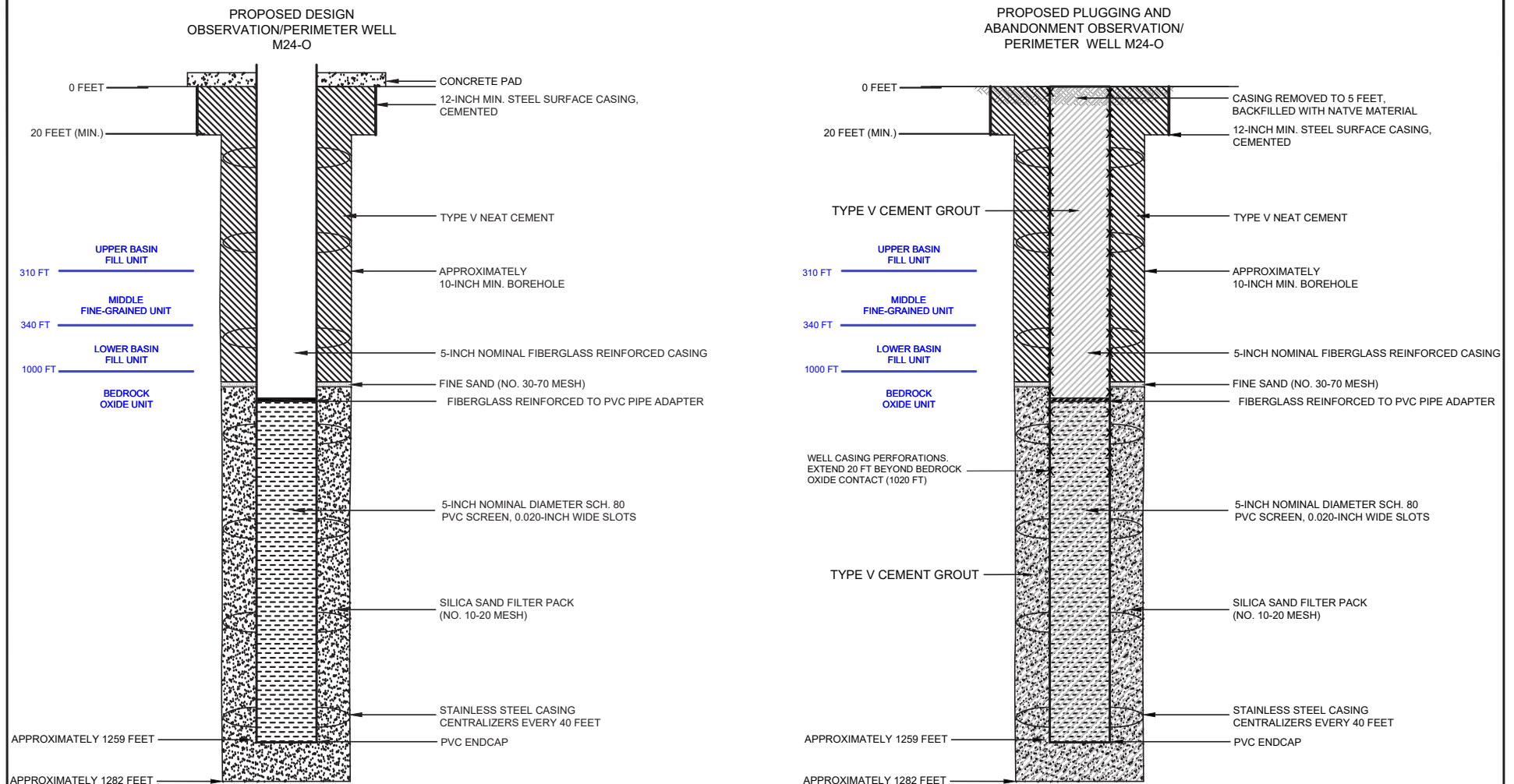
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PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL M24-O

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

M25-UBF

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04843896

Surface Location

SW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4368624

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the planned clean out interval to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

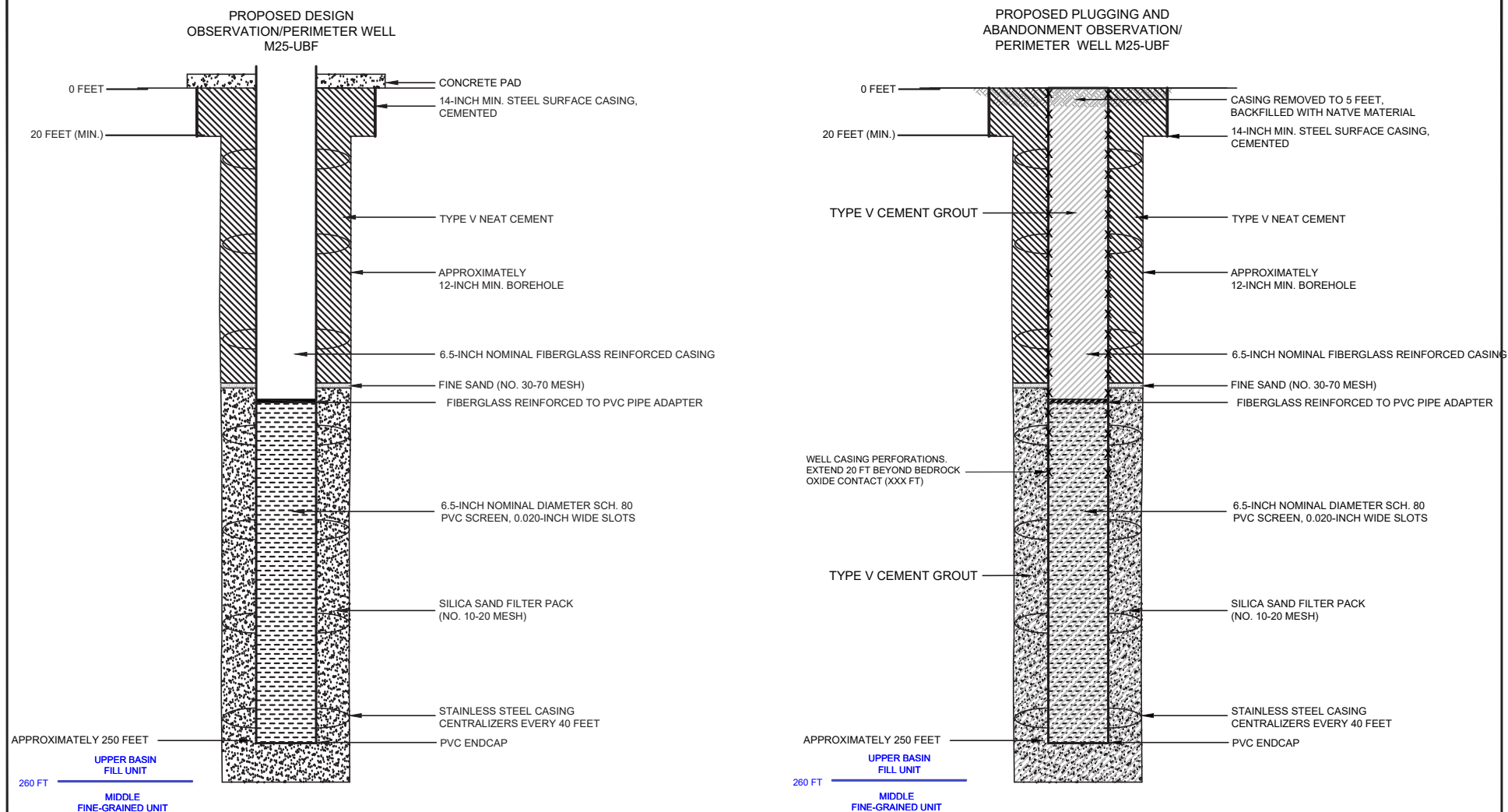
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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NOTES

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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL M25-UBF

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

M26-O

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05455636

Surface Location

SW 1/4 of NW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4342479

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the planned clean out interval to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

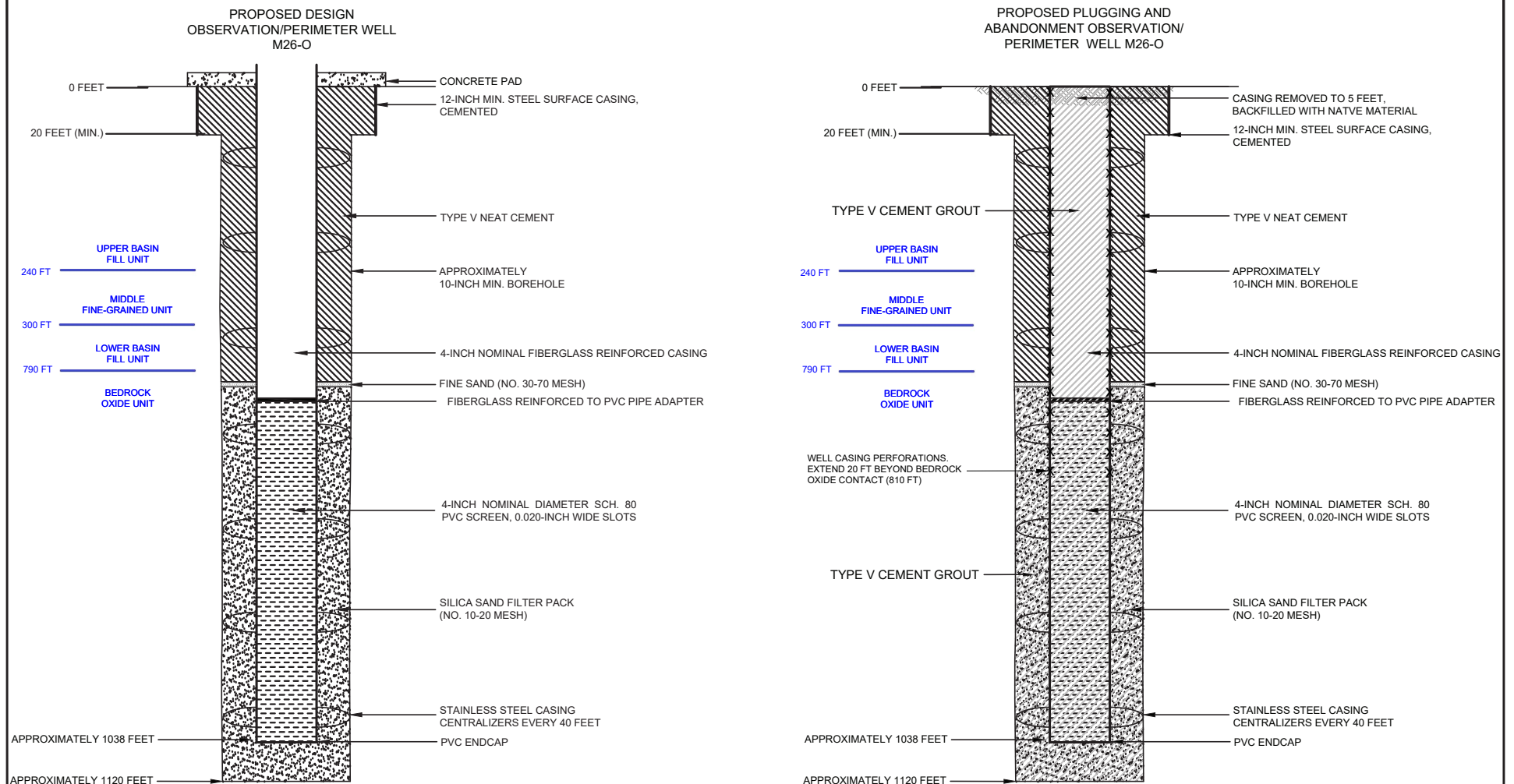
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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

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NOTES

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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL M26-O

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

M27-LBF

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05456055

Surface Location

SW 1/4 of NW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4344091

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

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Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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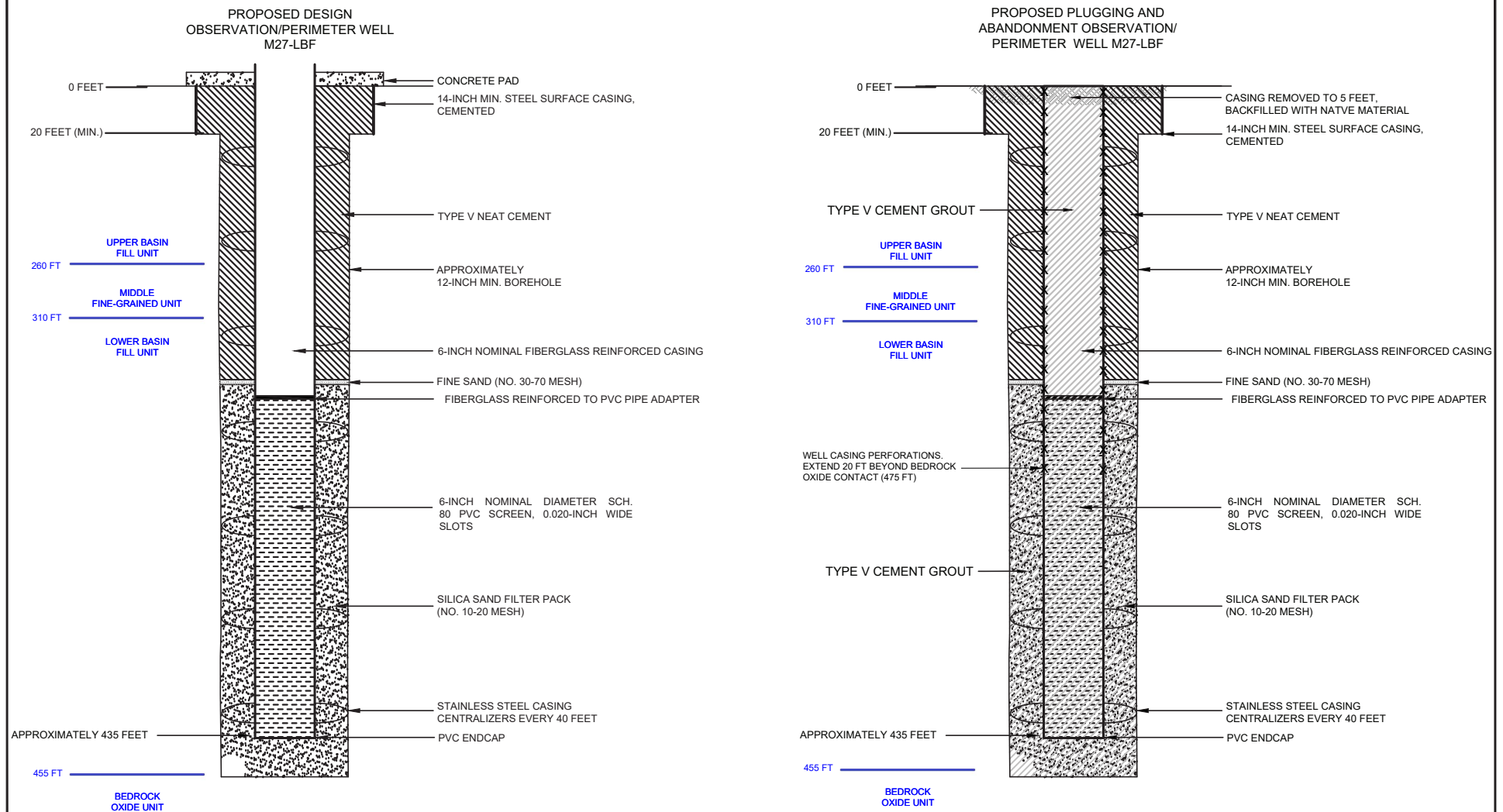
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NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL M27-LBF

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

M28-LBF

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05470276

Surface Location

SW 1/4 of NW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4344367

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the planned clean out interval to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

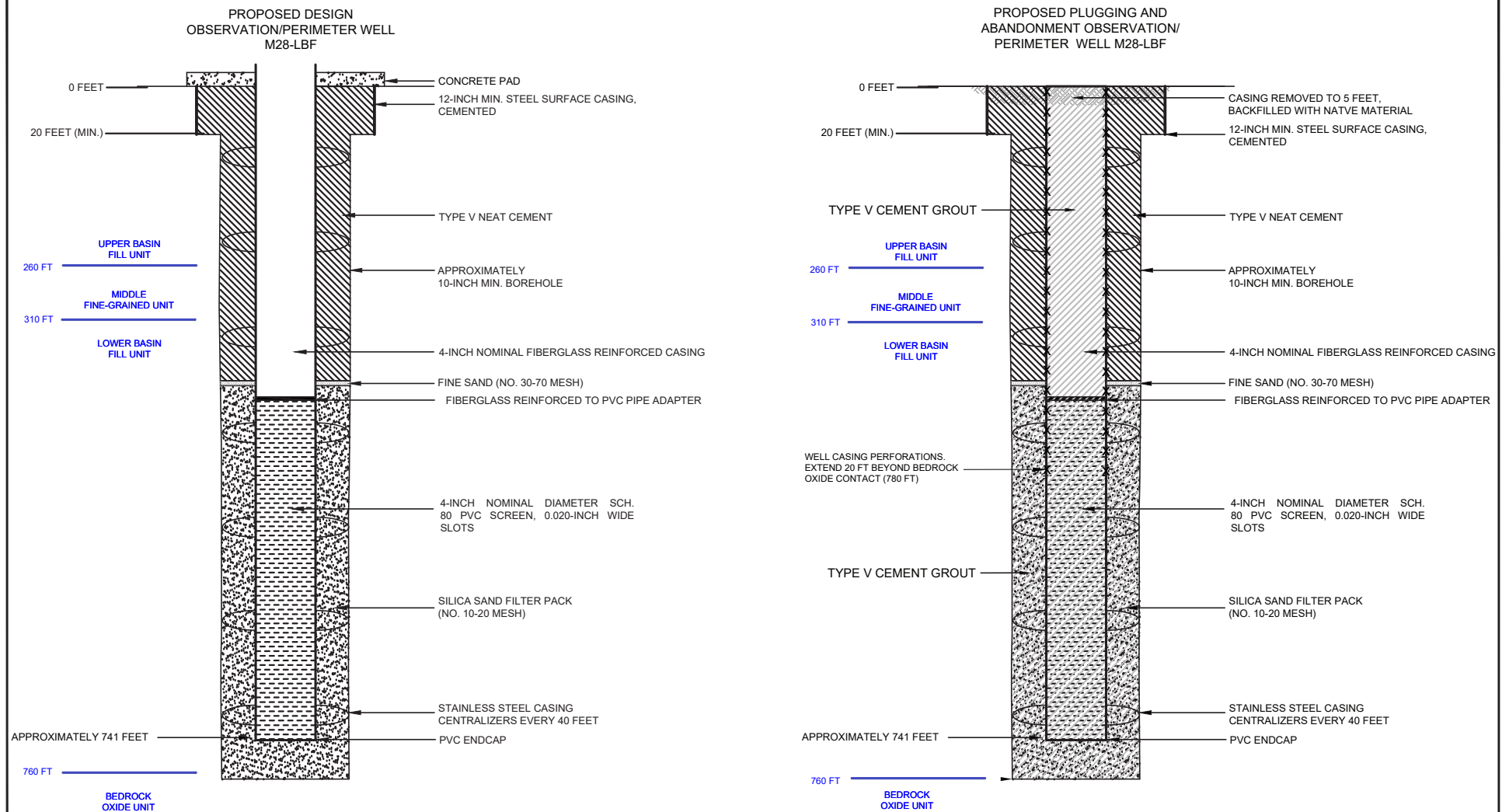
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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NOTES

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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL M28-LBF

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

M29-LBF

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05470521

Surface Location

SW 1/4 of NW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4342158

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the planned clean out interval to enable placement of cement seals.

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Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

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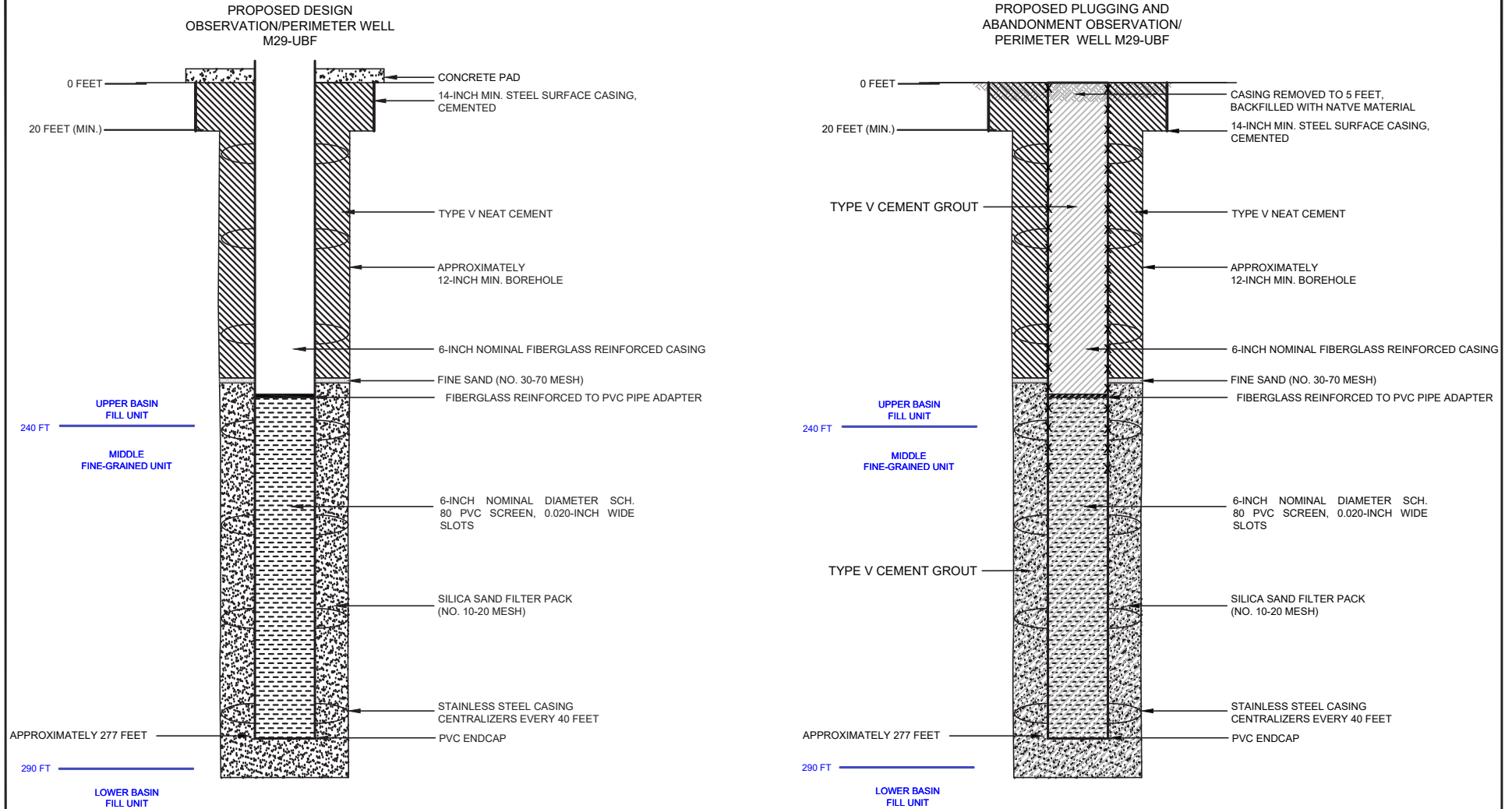
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**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL M29-UBF

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

M30-O

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.0536632

Surface Location

SW 1/4 of NE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4273007

 ft. from (N/S) Line of quarter section

 ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
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Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

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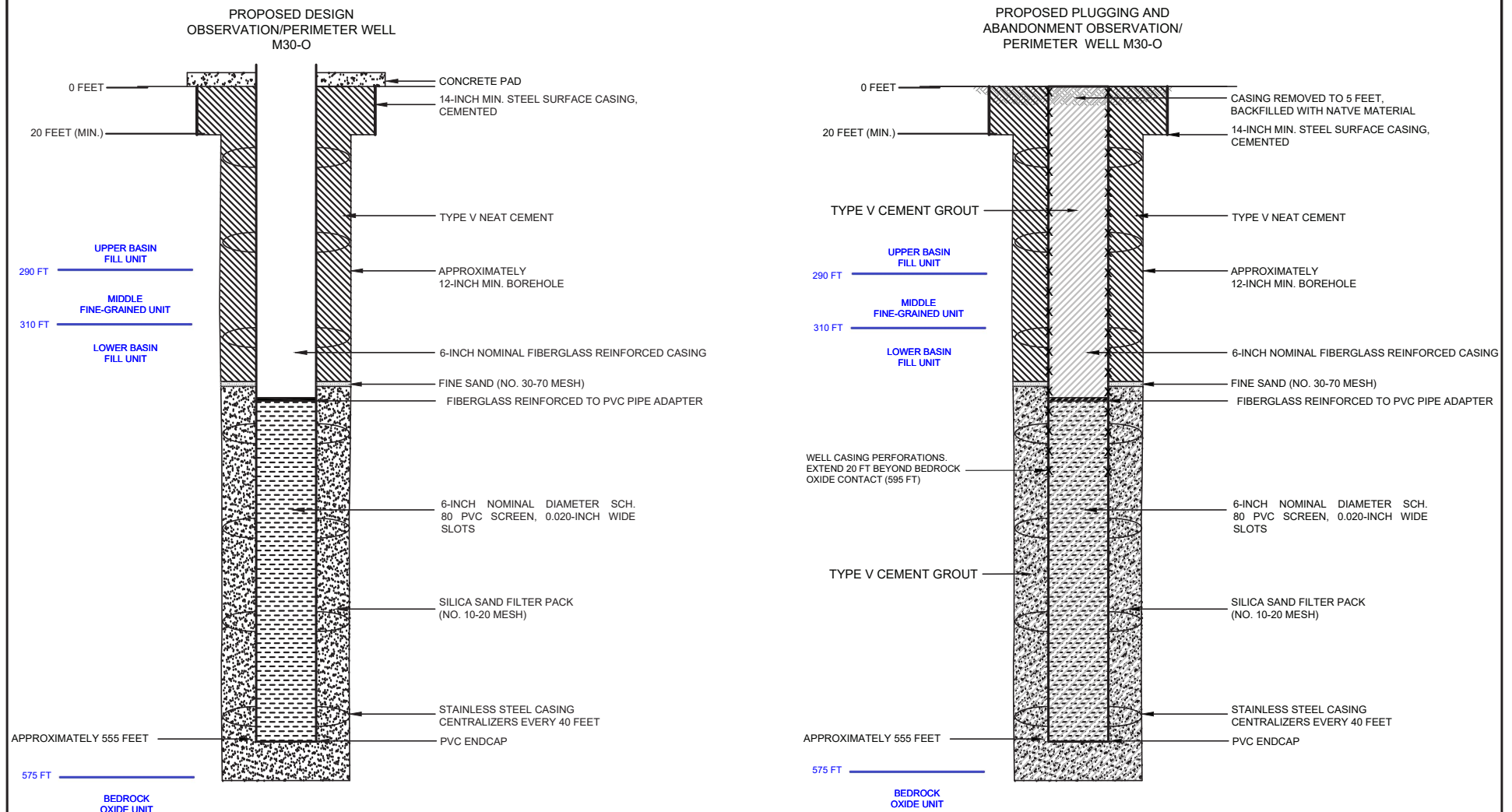
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PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL M30-O

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

M31-LBF

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05353792

Surface Location

SW 1/4 of NE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4271741

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the planned clean out interval to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

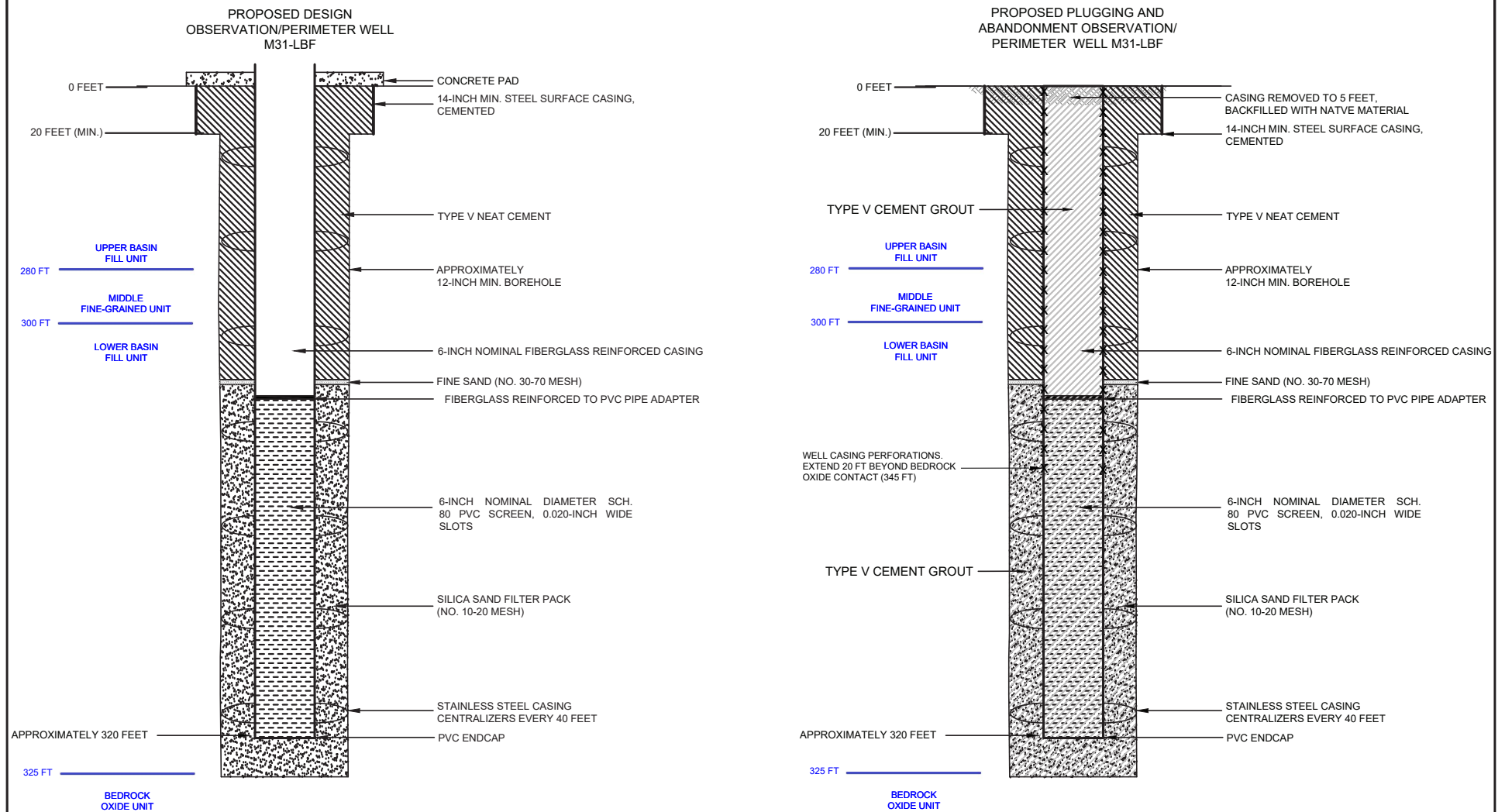
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL M31-LBF

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

M32-UBF

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05099515

Surface Location

NE 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4223581

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the planned clean out interval to enable placement of cement seals.

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I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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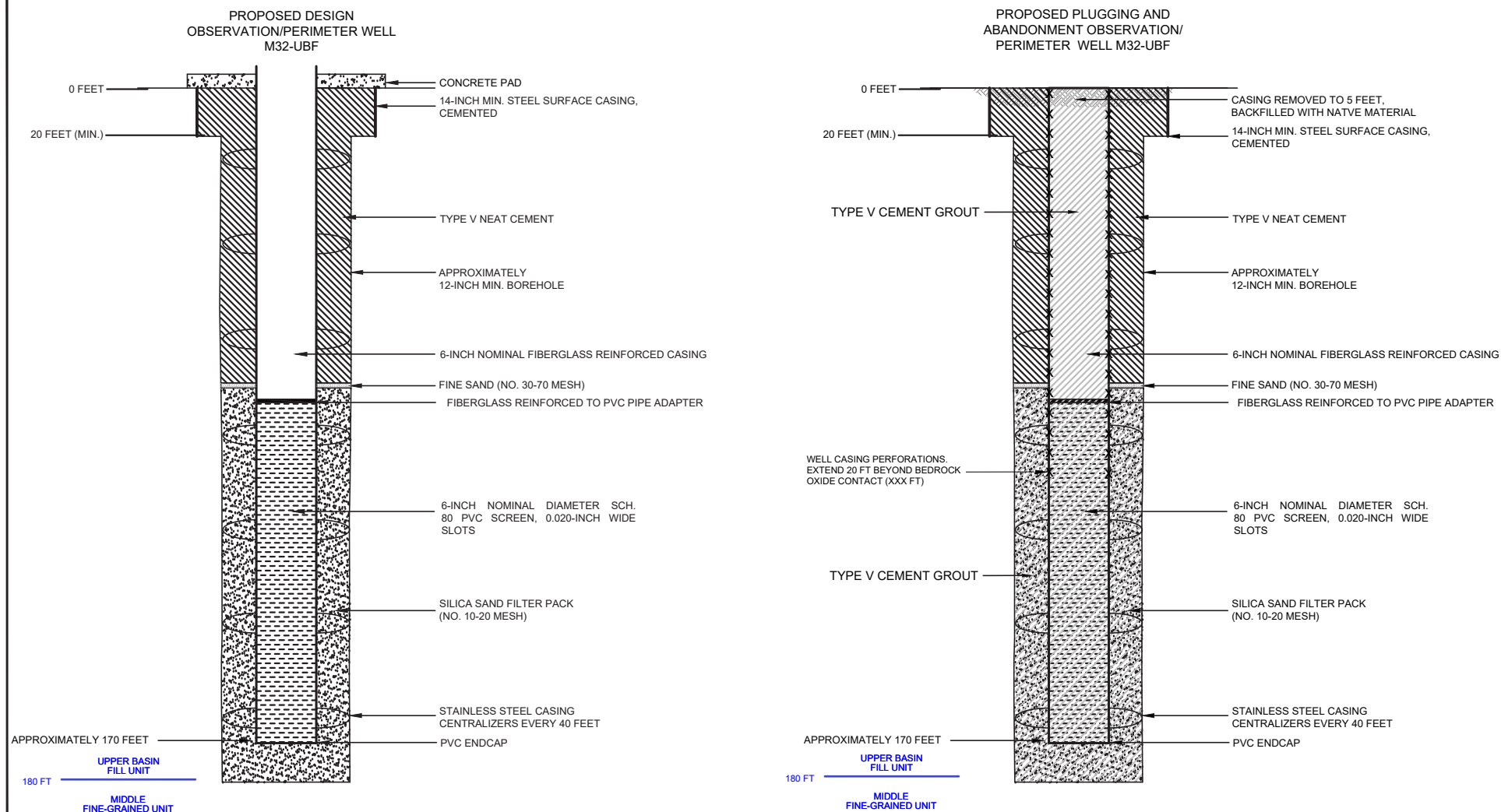
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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL M32-UBF

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
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Permit or EPA ID Number

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API Number

Full Well Name

M33-UBF

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05392427

Surface Location

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ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

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☐ Class II
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☐ Class V

- ☒ Notice Prior to Work
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Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

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INSTRUCTIONS FOR FORM 7520-19

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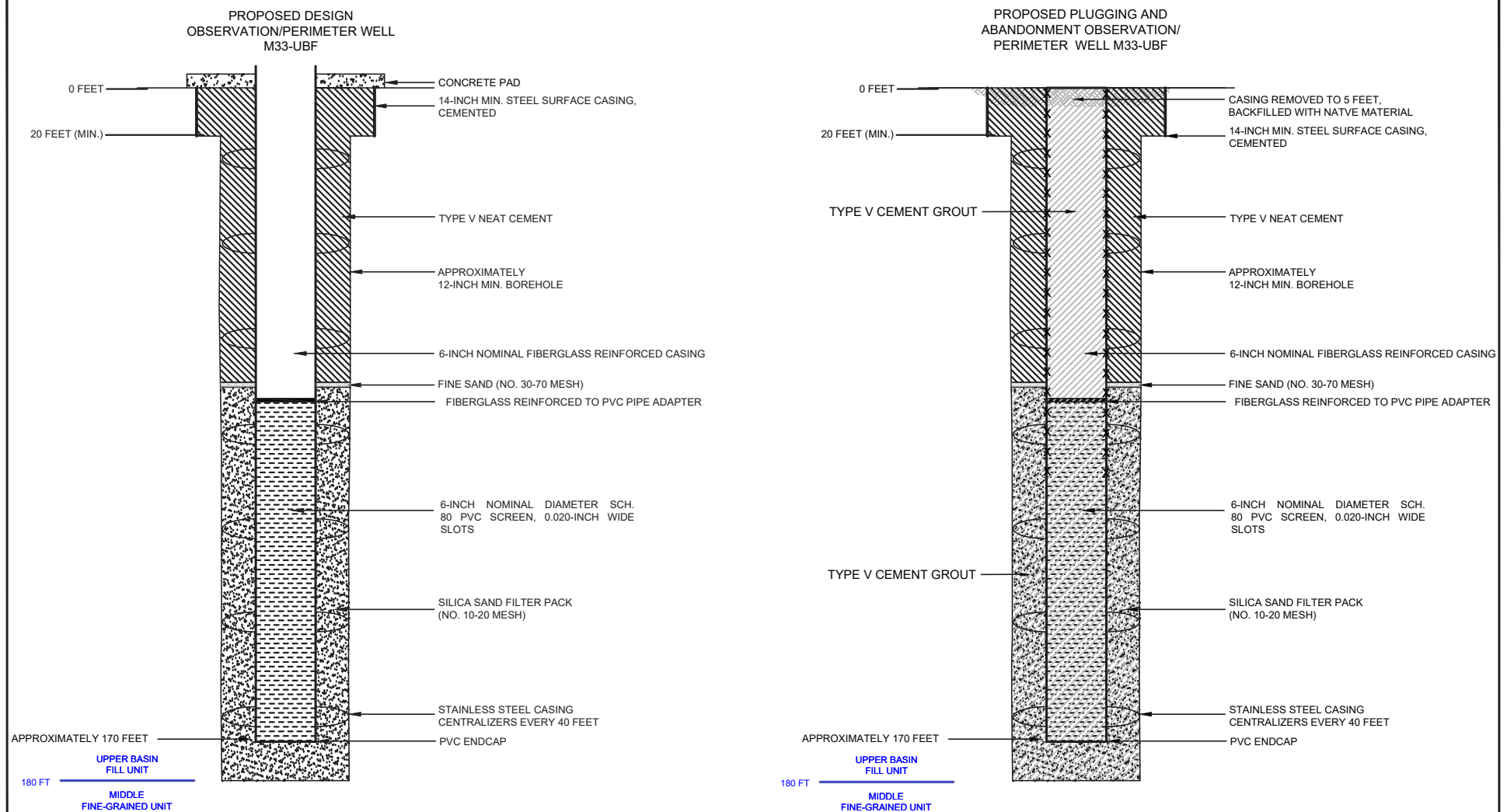
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NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL M33-UBF

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

O3-GL

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04835911

Surface Location

SE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4306507

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the planned clean out interval to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

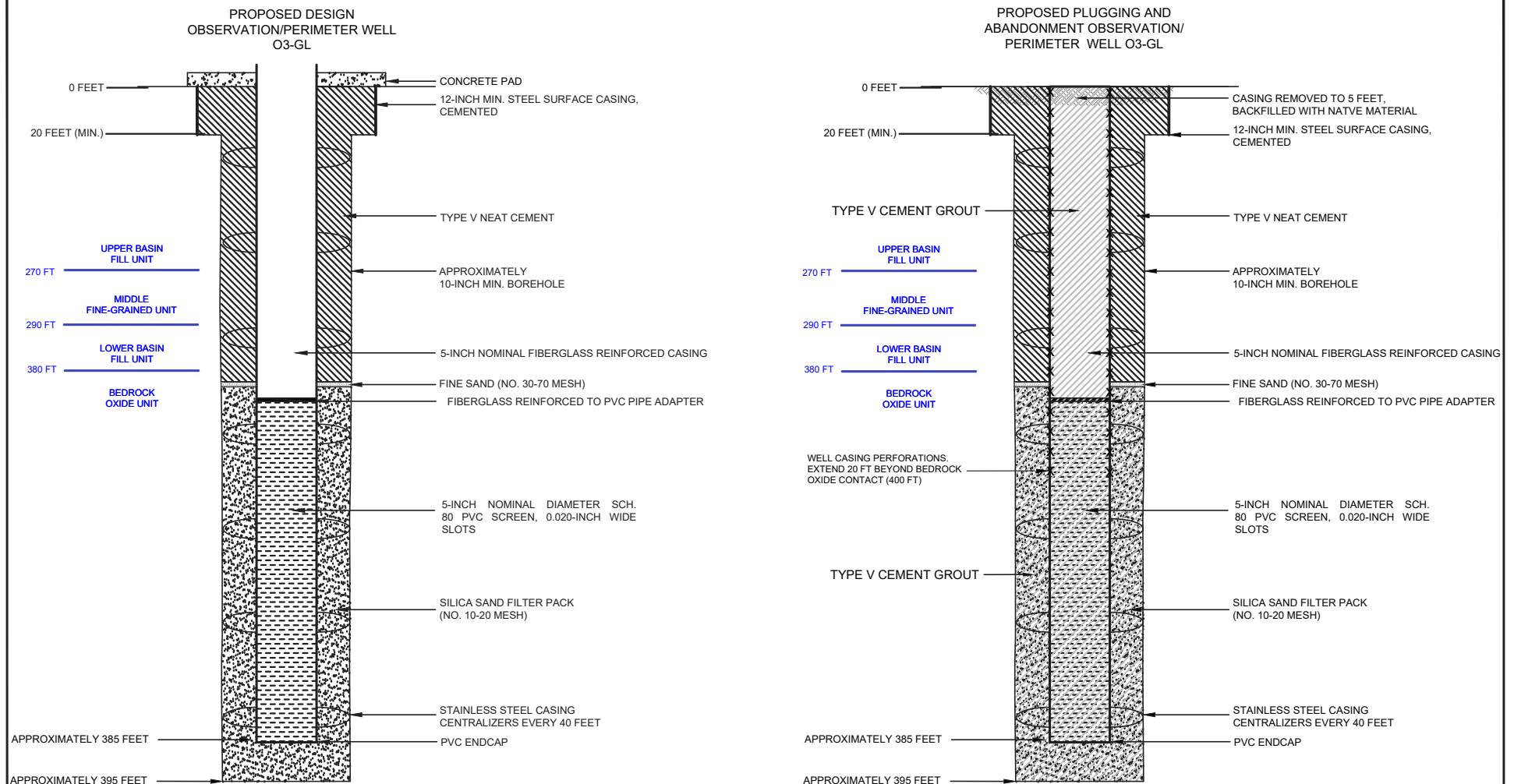
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL O3-GL

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

O5.1-O

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04632672

Surface Location

SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4284512

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the planned clean out interval to enable placement of cement seals.

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A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

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The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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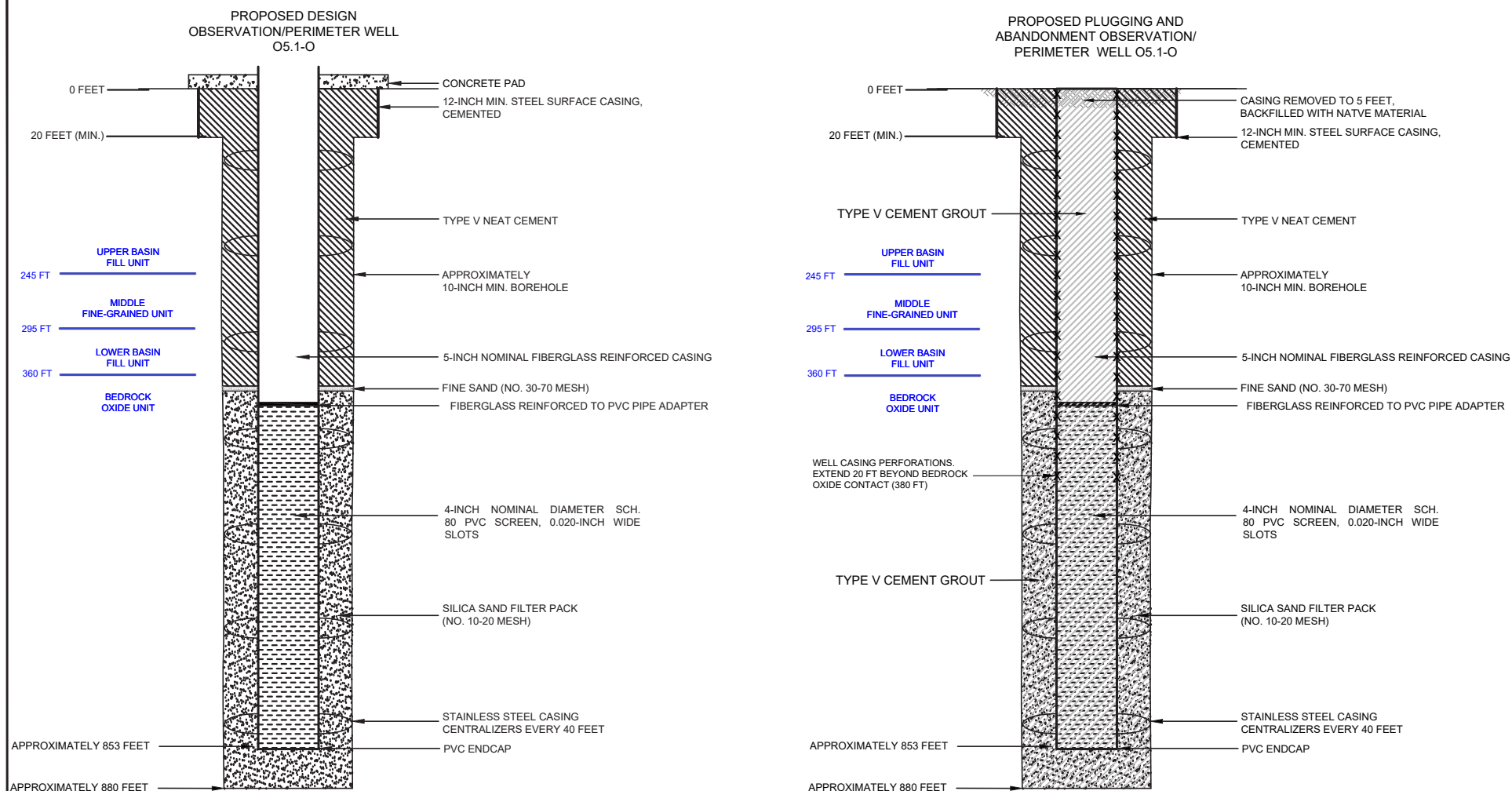
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**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL O5.1-O

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

O5.2-O

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04630899

Surface Location

SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4286964

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
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Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

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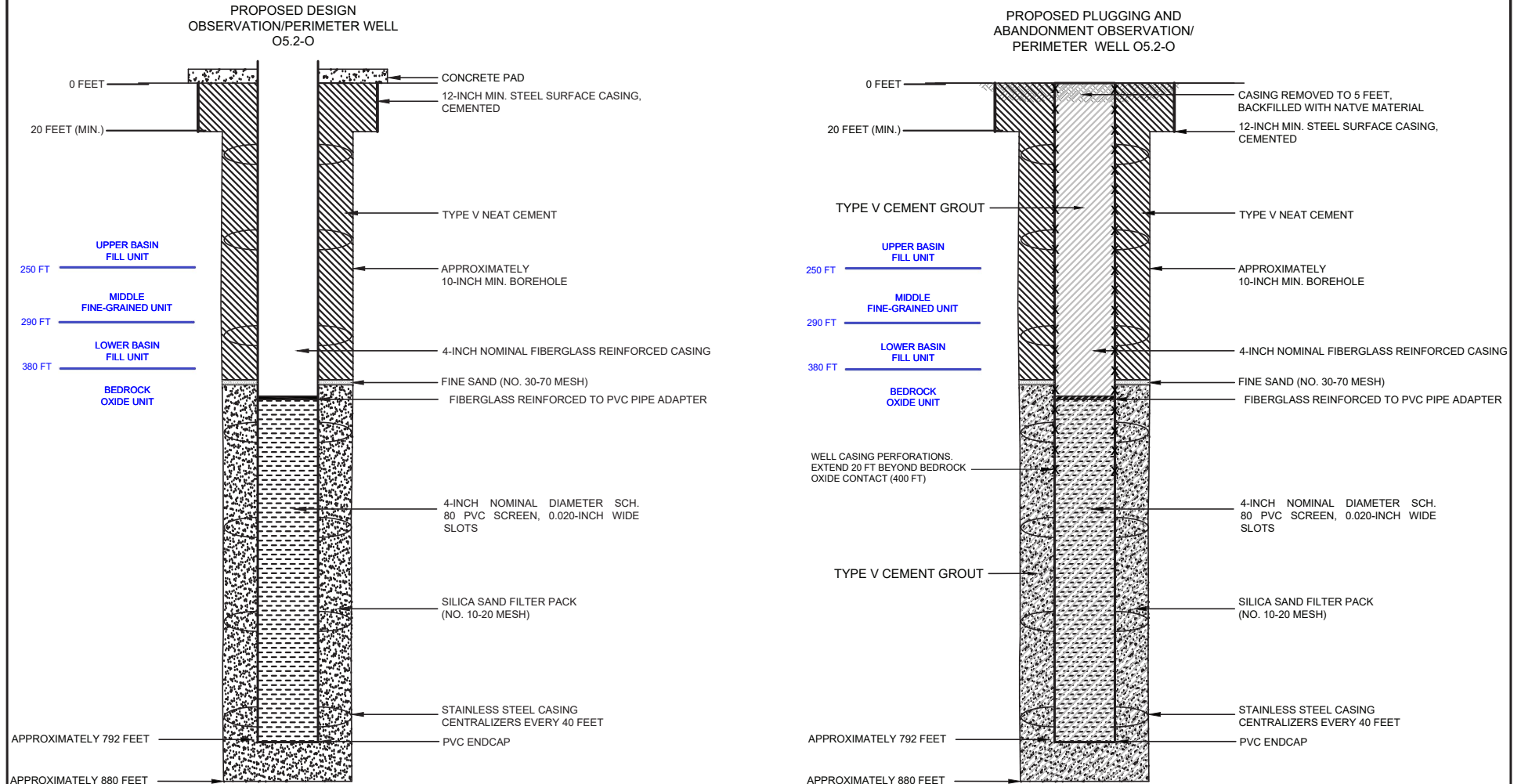
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NOTES

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**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL O5.2-O

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

O8-GU

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05205935

Surface Location

NW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4291167

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the planned clean out interval to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

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For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

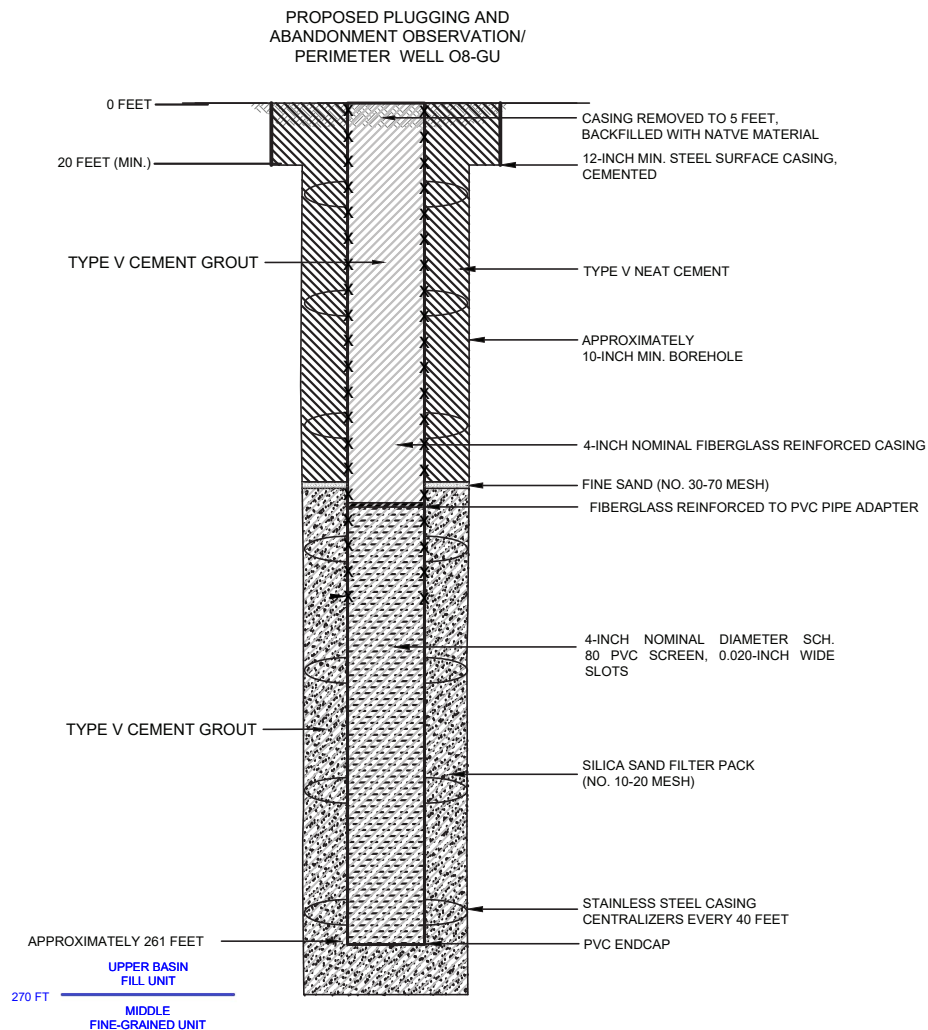
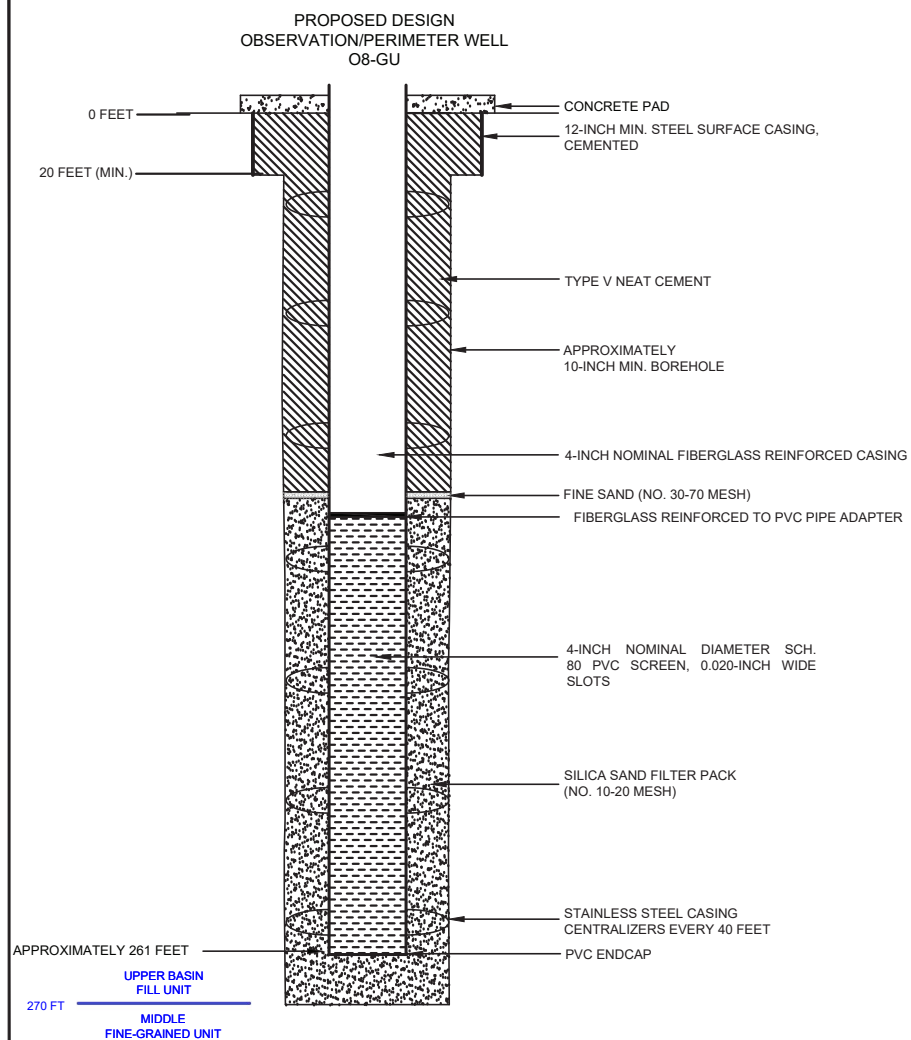
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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL O8-GU

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



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Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
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Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

O8-O

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.0523627

Surface Location

NW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4290919

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

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10/3/2019

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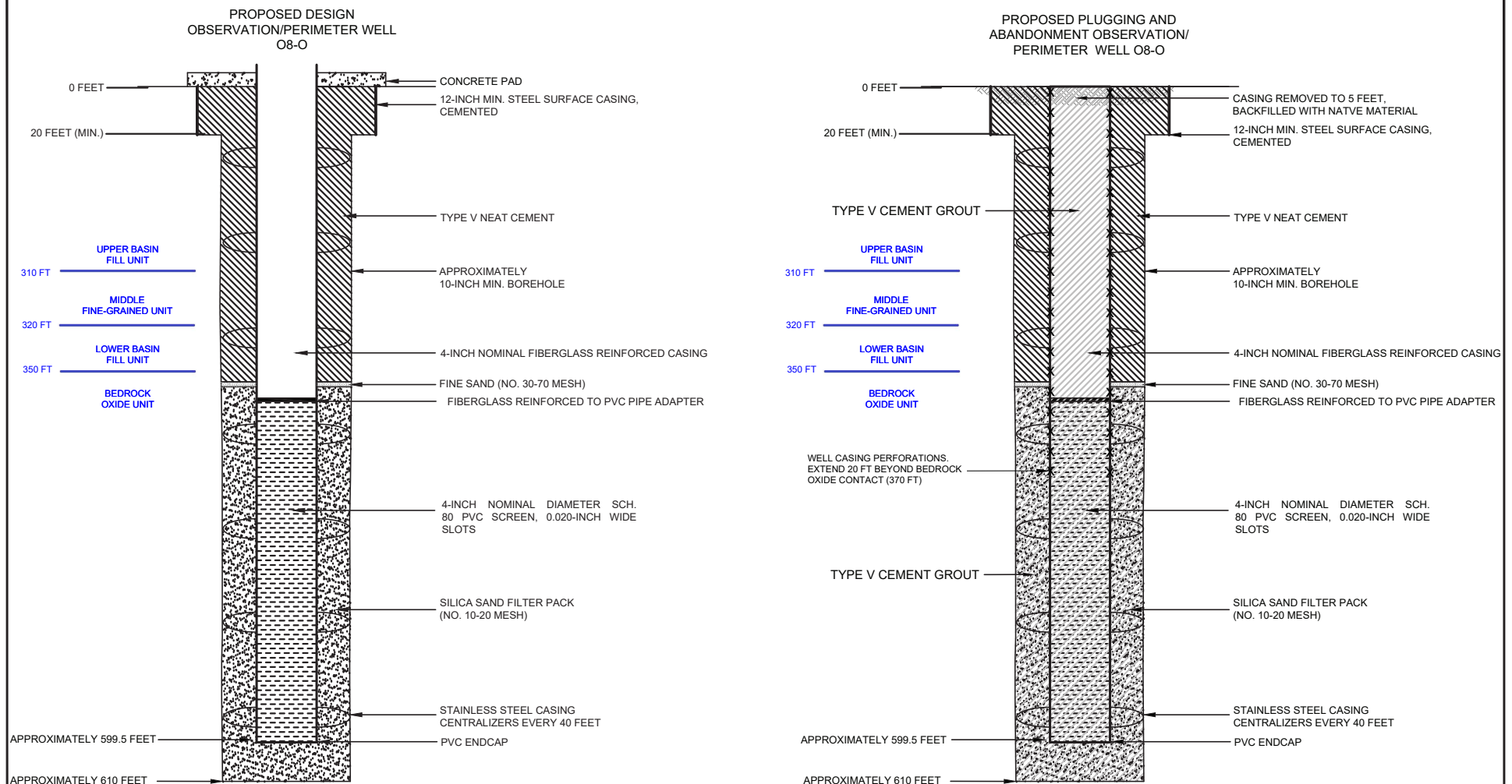
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**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL O8-O

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



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Type of Action (pick one)

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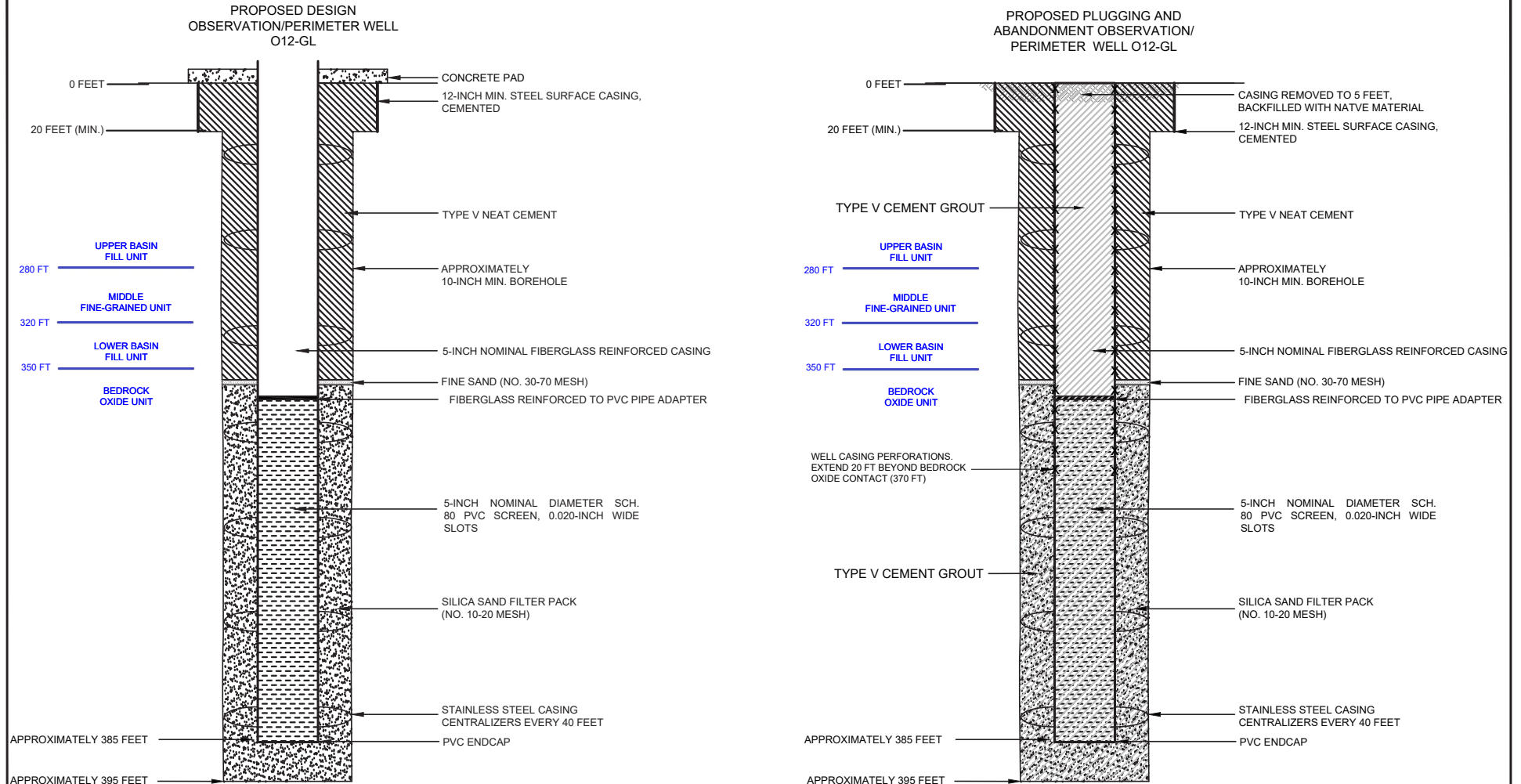
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PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL O12-GL

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

O12-O

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04644518

Surface Location

SE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4323275

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the planned clean out interval to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

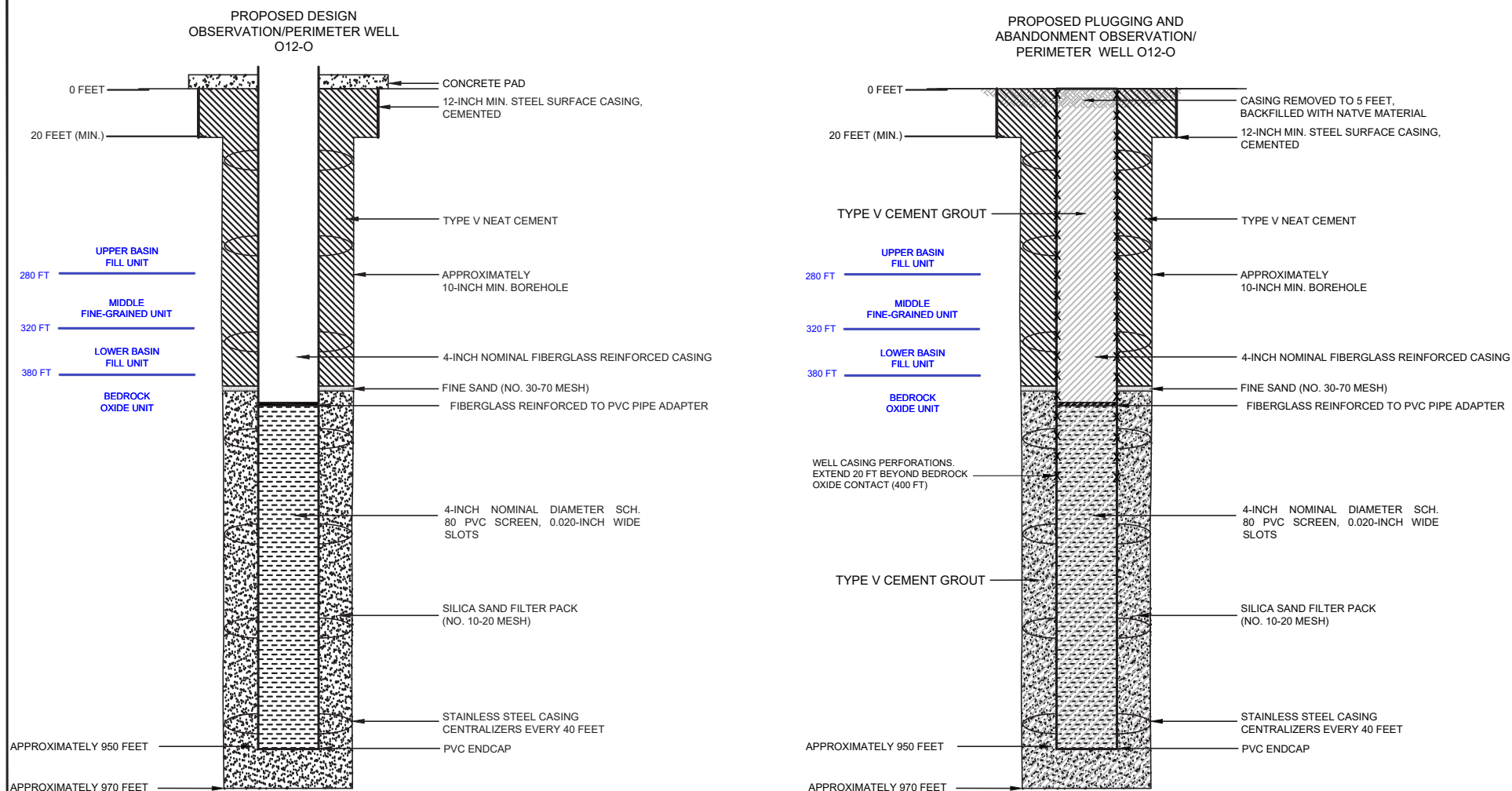
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL O12-O

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

O13-O

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05234918

Surface Location

NW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4349492

 ft. from (N/S) Line of quarter section

 ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
 Date Expected to Commence March 2021
☐ Report After Work
 Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the planned clean out interval to enable placement of cement seals.

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A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

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The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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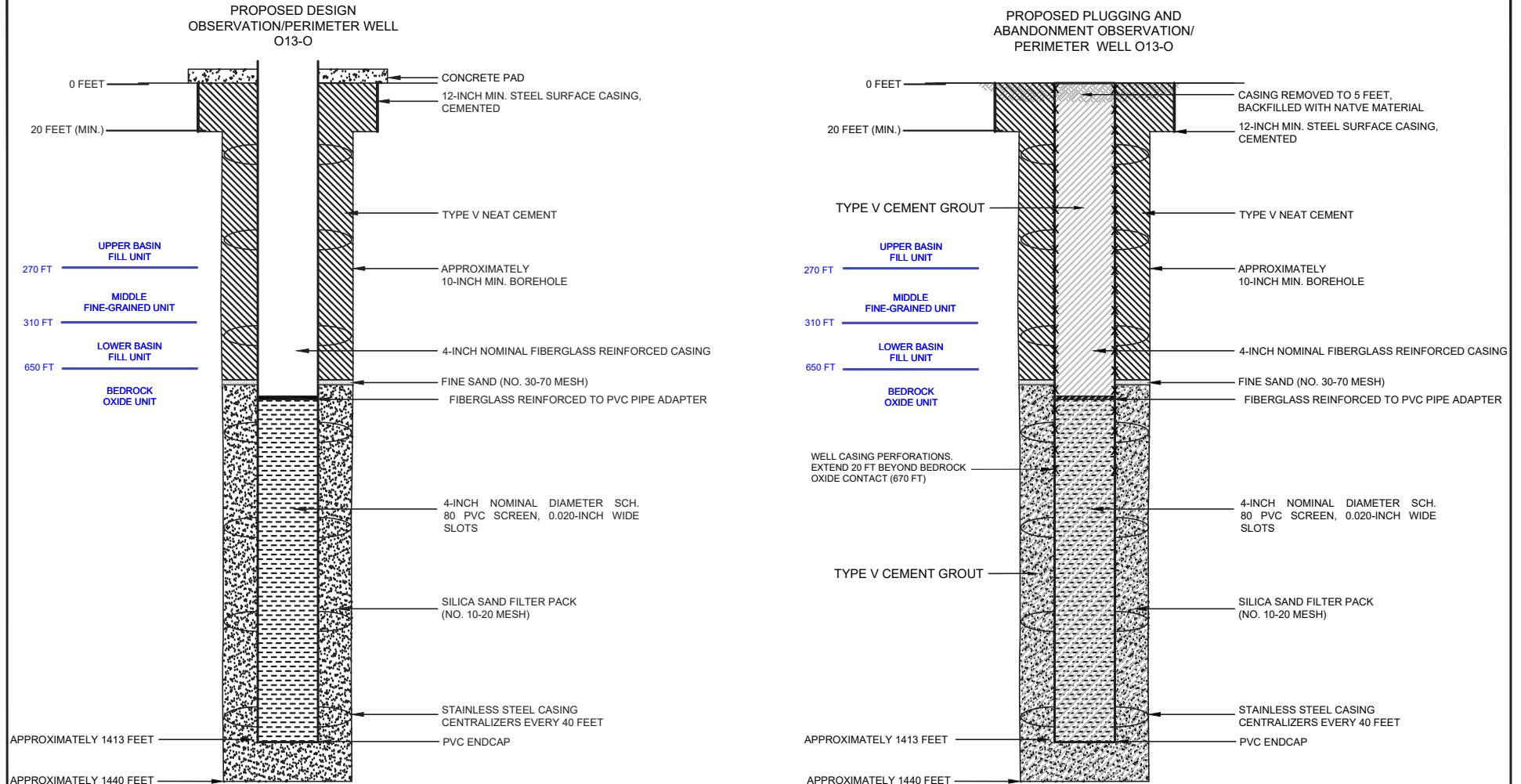
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**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL O13-O

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

O15-O

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04819175

Surface Location

SW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4352662

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

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Signature

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INSTRUCTIONS FOR FORM 7520-19

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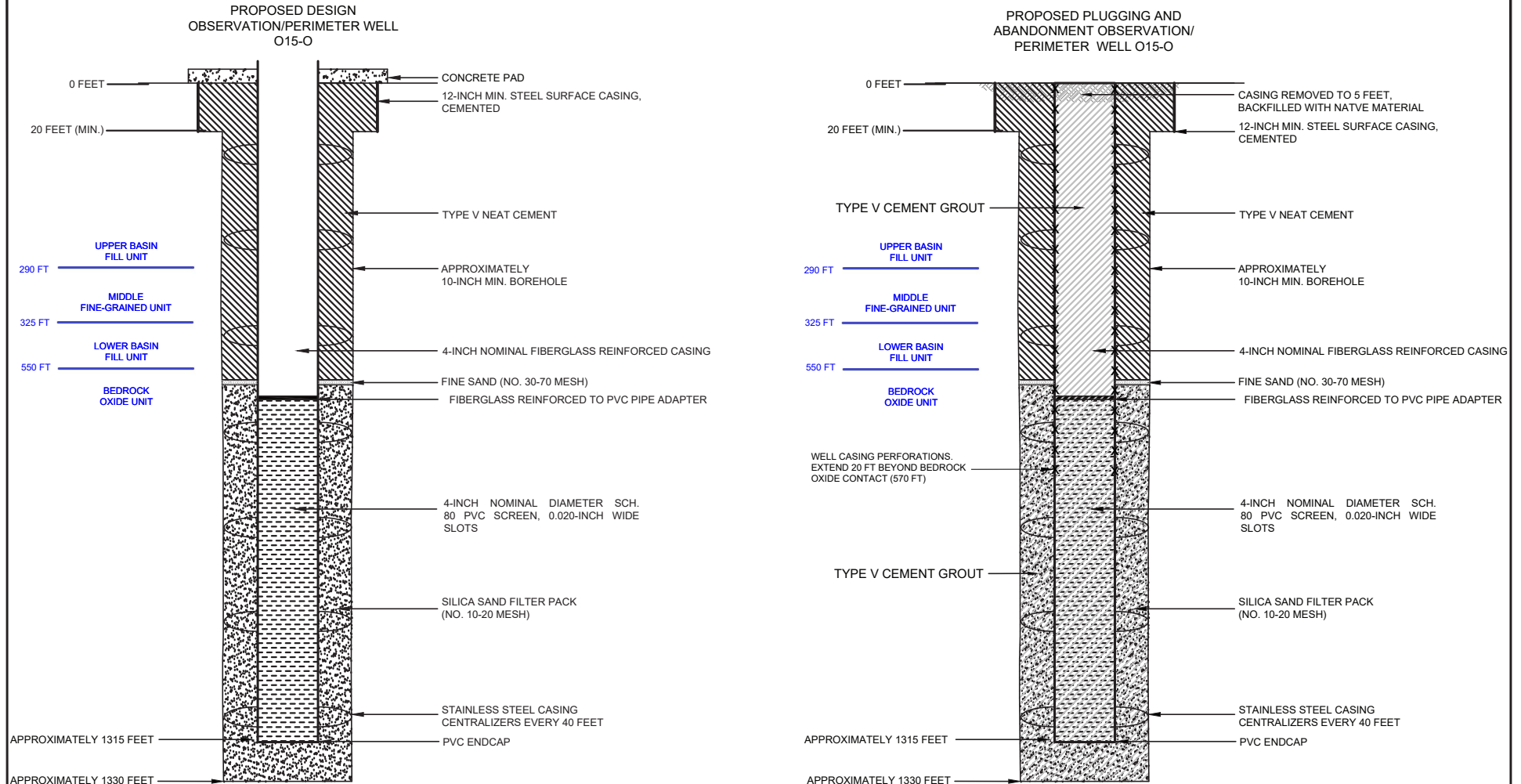
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PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

**HALEY
ALDRICH**

FLORENCE COPPER, INC.
 FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL O15-O

SEPTEMBER 2019
 SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

O19-GL

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05363133

Surface Location

SE 1/4 of NW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4328698

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the planned clean out interval to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

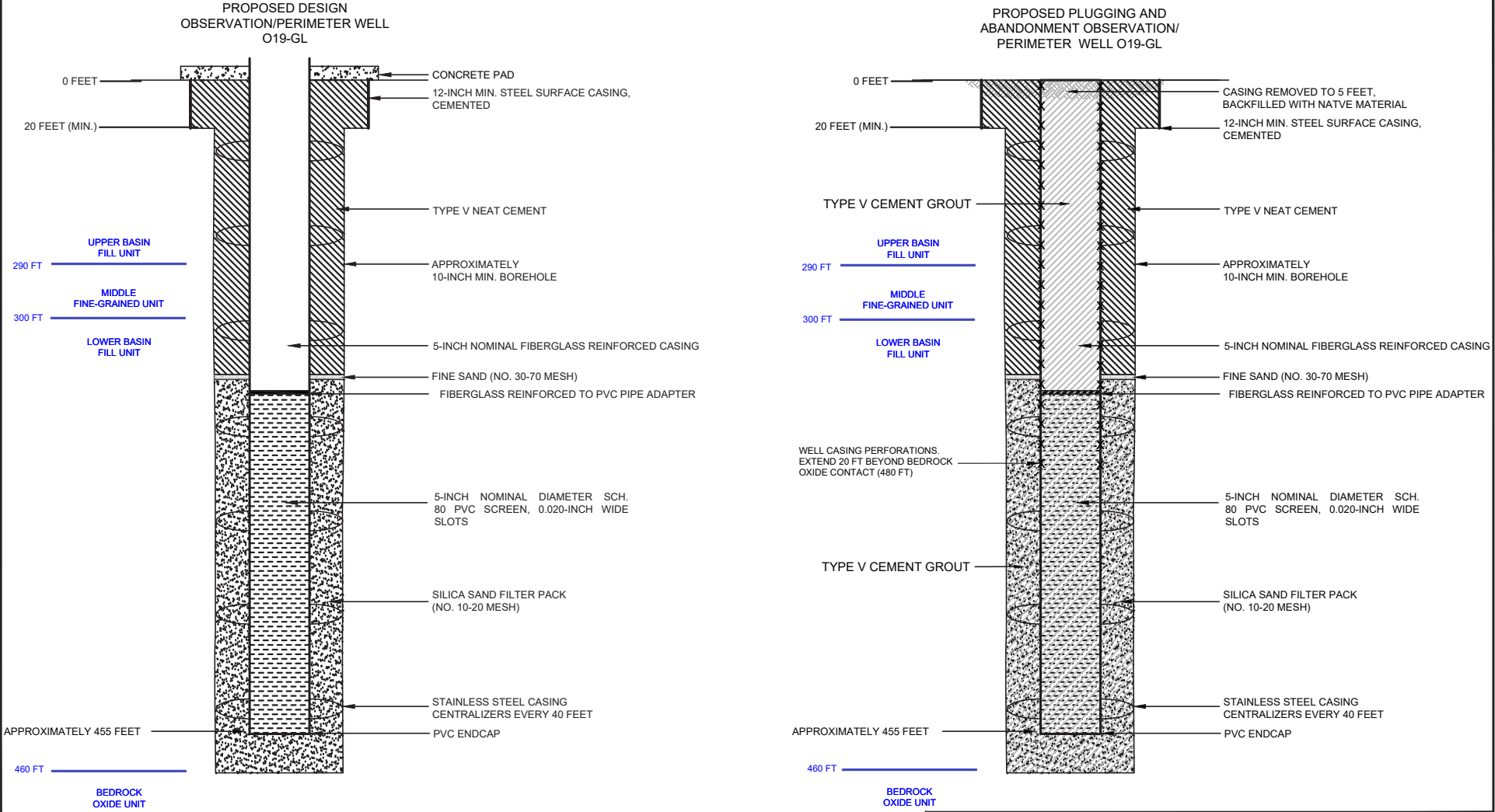
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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

**ABANDONMENT SCHEMATIC
OBSERVATION/PERIMETER
WELL O19-GL**

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

O19-O

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05360528

Surface Location

SE 1/4 of NW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.432459

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

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Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

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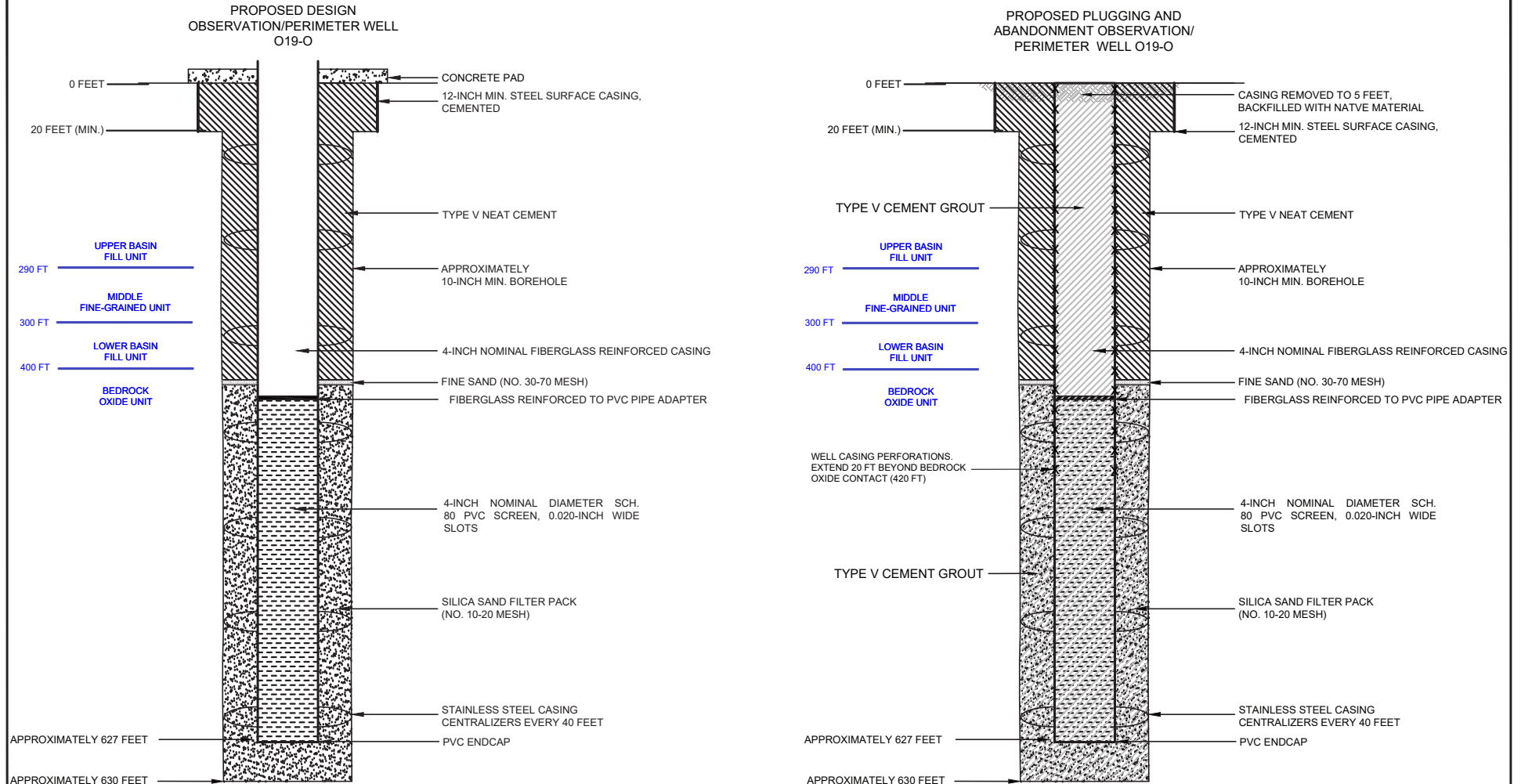
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**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL O19-O

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

O28.1-O

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04890302

Surface Location

SE 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4237763

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
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Signature

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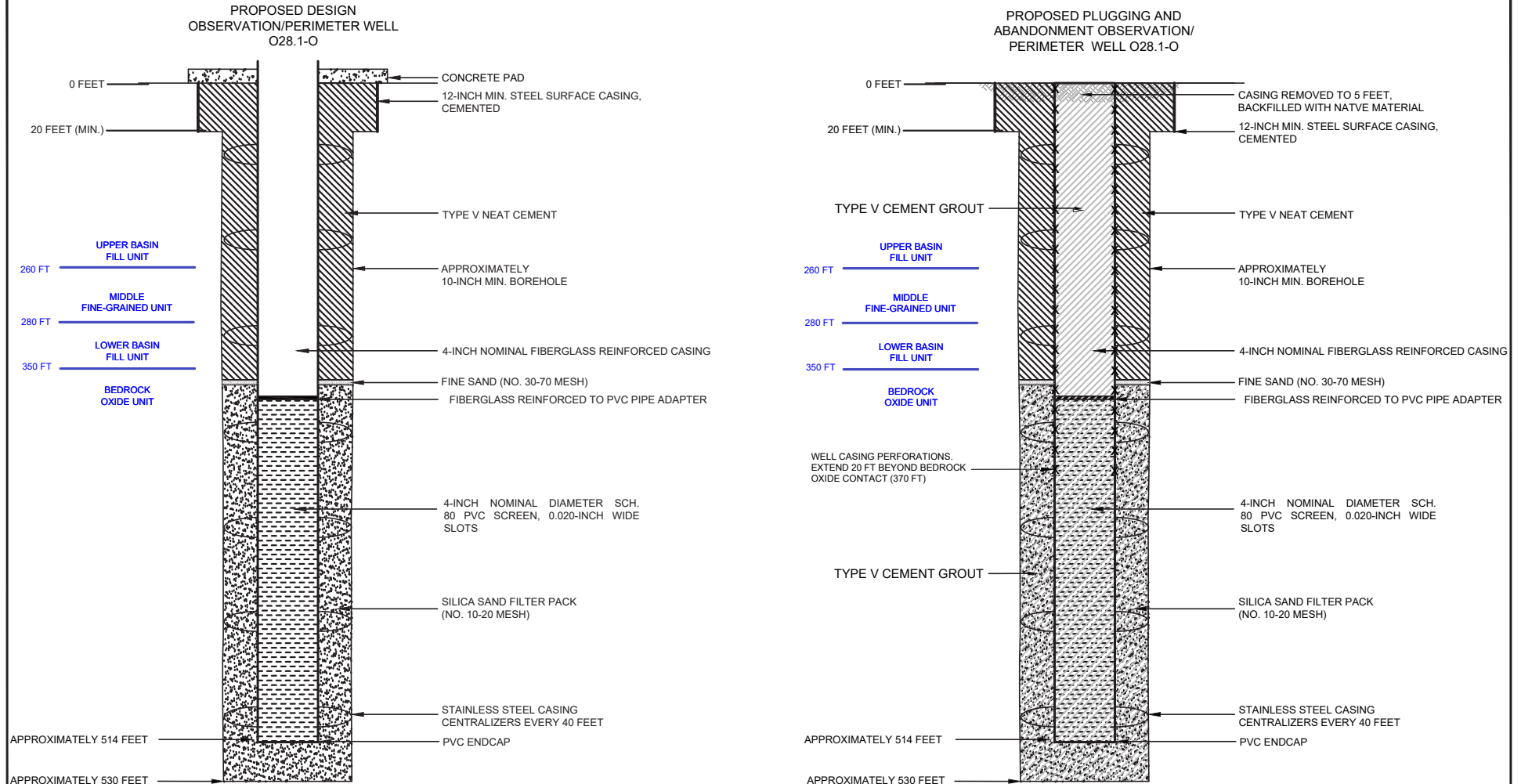
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PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL O28.1-O

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

O28.2-S

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04881686

Surface Location

SE 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4234635

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

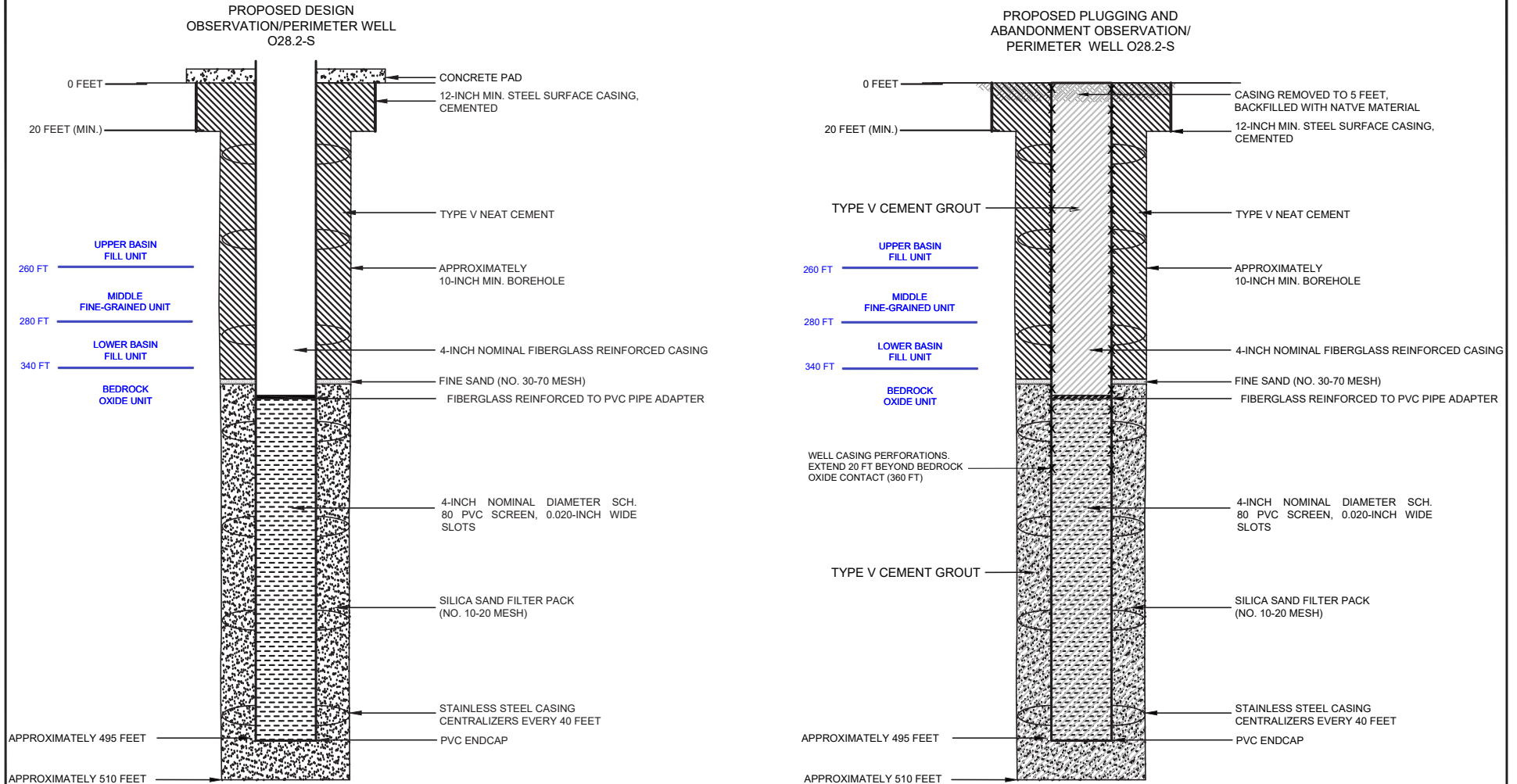
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL O28.2-S

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

O28-GL

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04874082

Surface Location

SE 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.423977

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.

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If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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FULL WELL NAME: Enter the full name of the well or project.

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WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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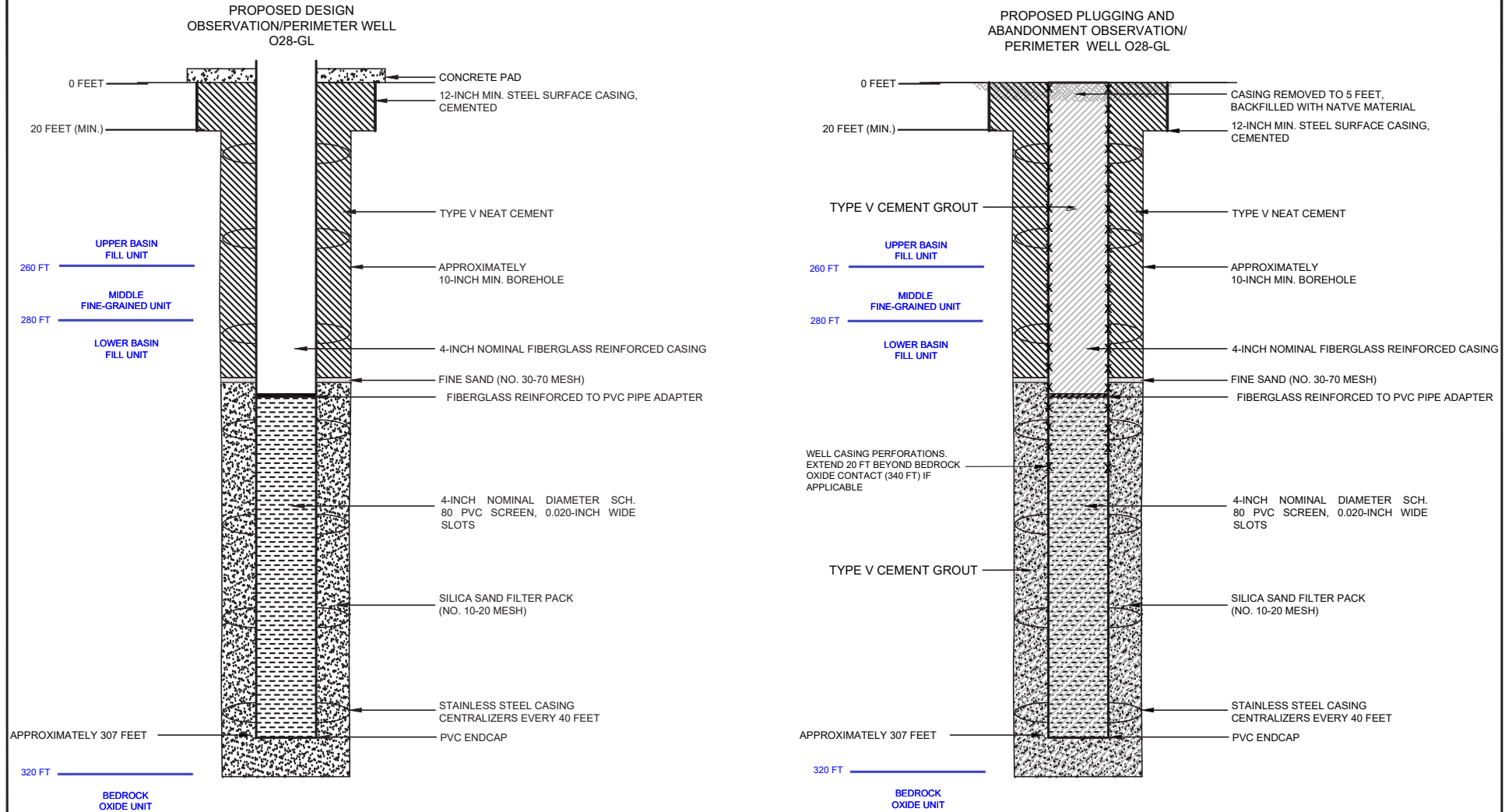
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FLORENCE COPPER, INC.
 FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL O28-GL

SEPTEMBER 2019
 SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

O39-O

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04499319

Surface Location

NE 1/4 of NW 1/4 of Section 33 Township 4S Range 9E

Longitude -111.4300958

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

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Signature

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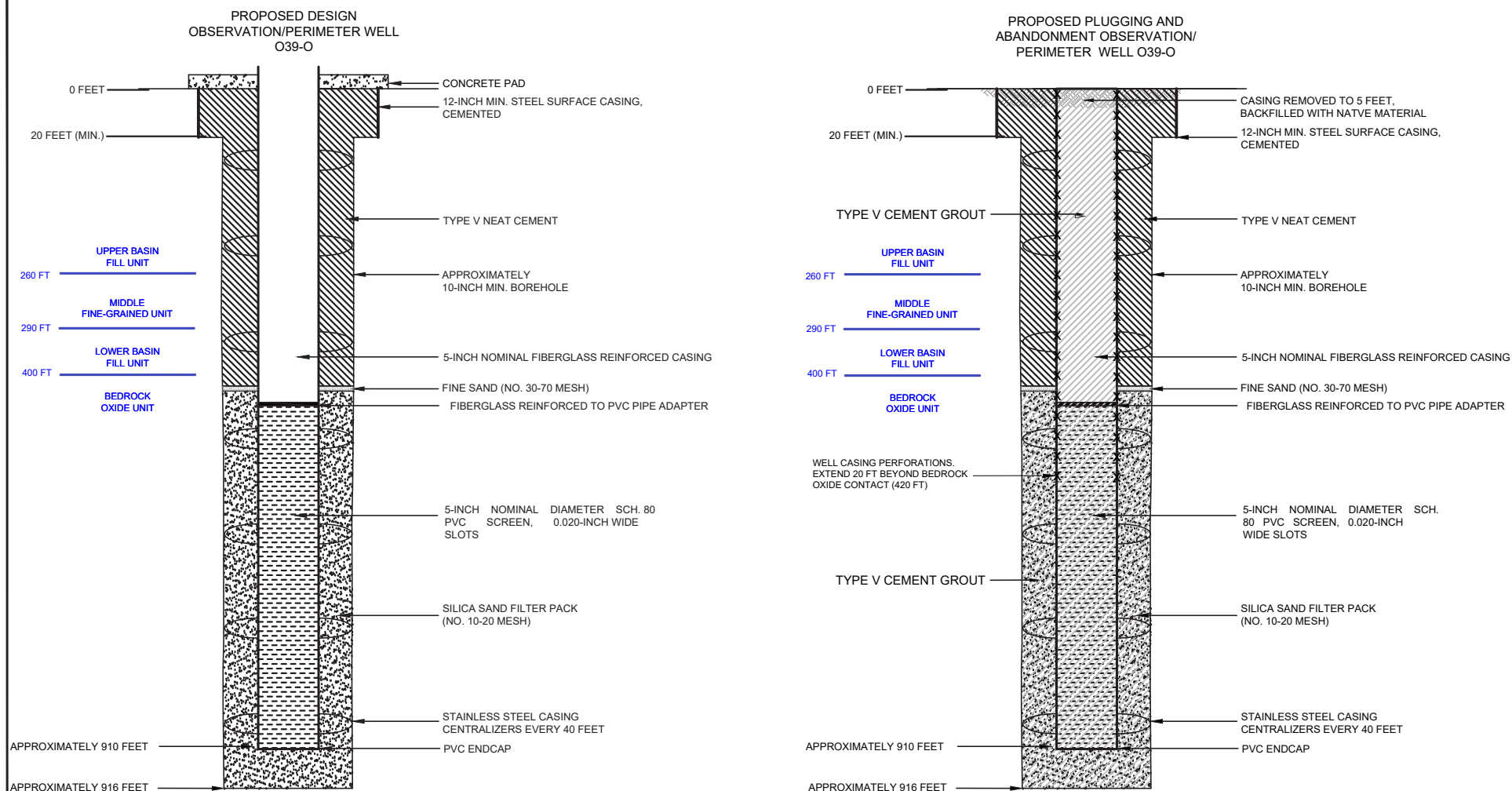
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NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL O39-O

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

O49-GL

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.0449406

Surface Location

NW 1/4 of NW 1/4 of Section 33 Township 4S Range 9E

Longitude -111.4353851

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

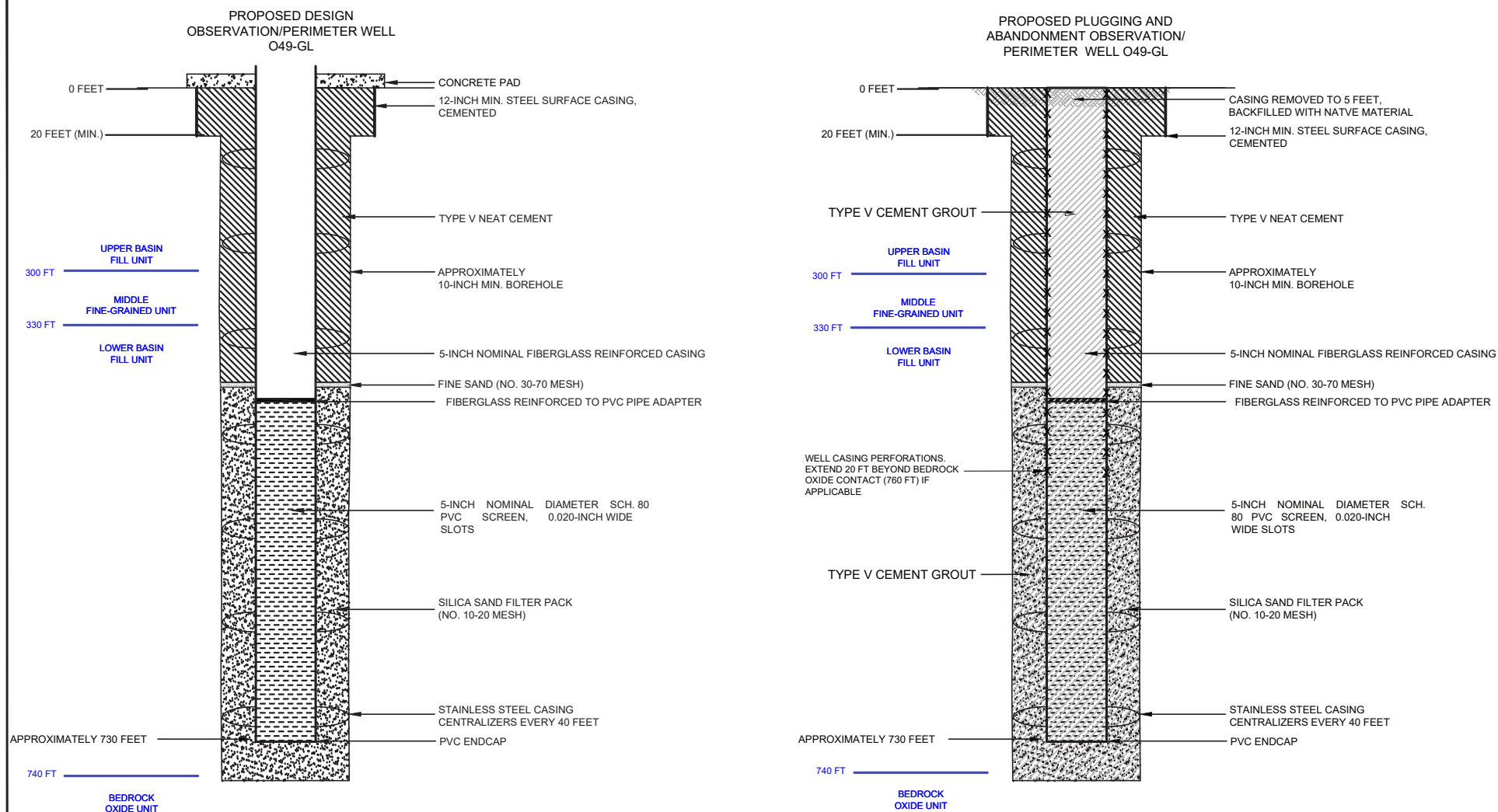
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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL O49-GL

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

O49-O

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04494394

Surface Location

NW 1/4 of NW 1/4 of Section 33 Township 4S Range 9E

Longitude -111.4352552

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

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Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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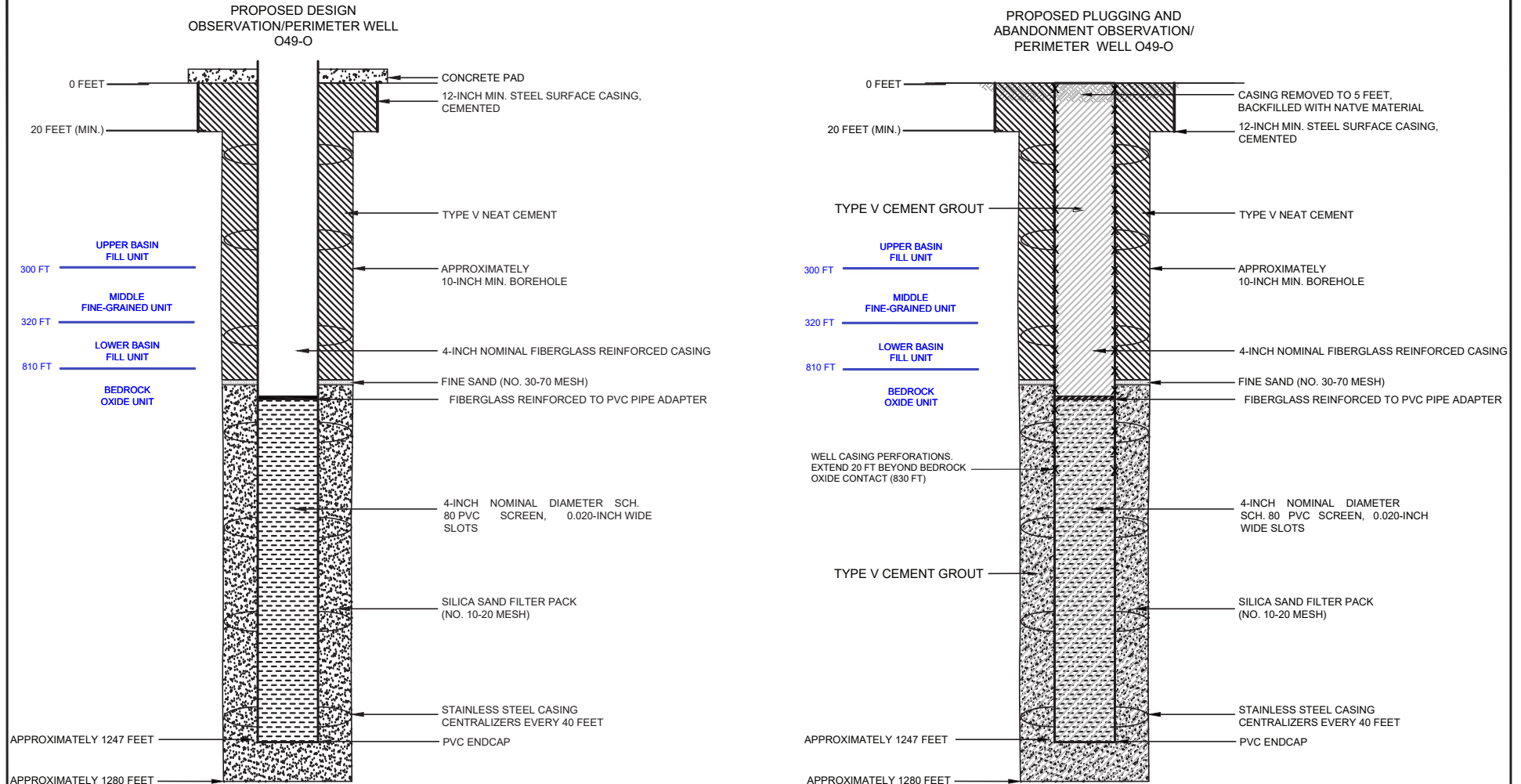
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**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL O49-O

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

OB-1

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04882831

Surface Location

SE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4315015

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
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Signature

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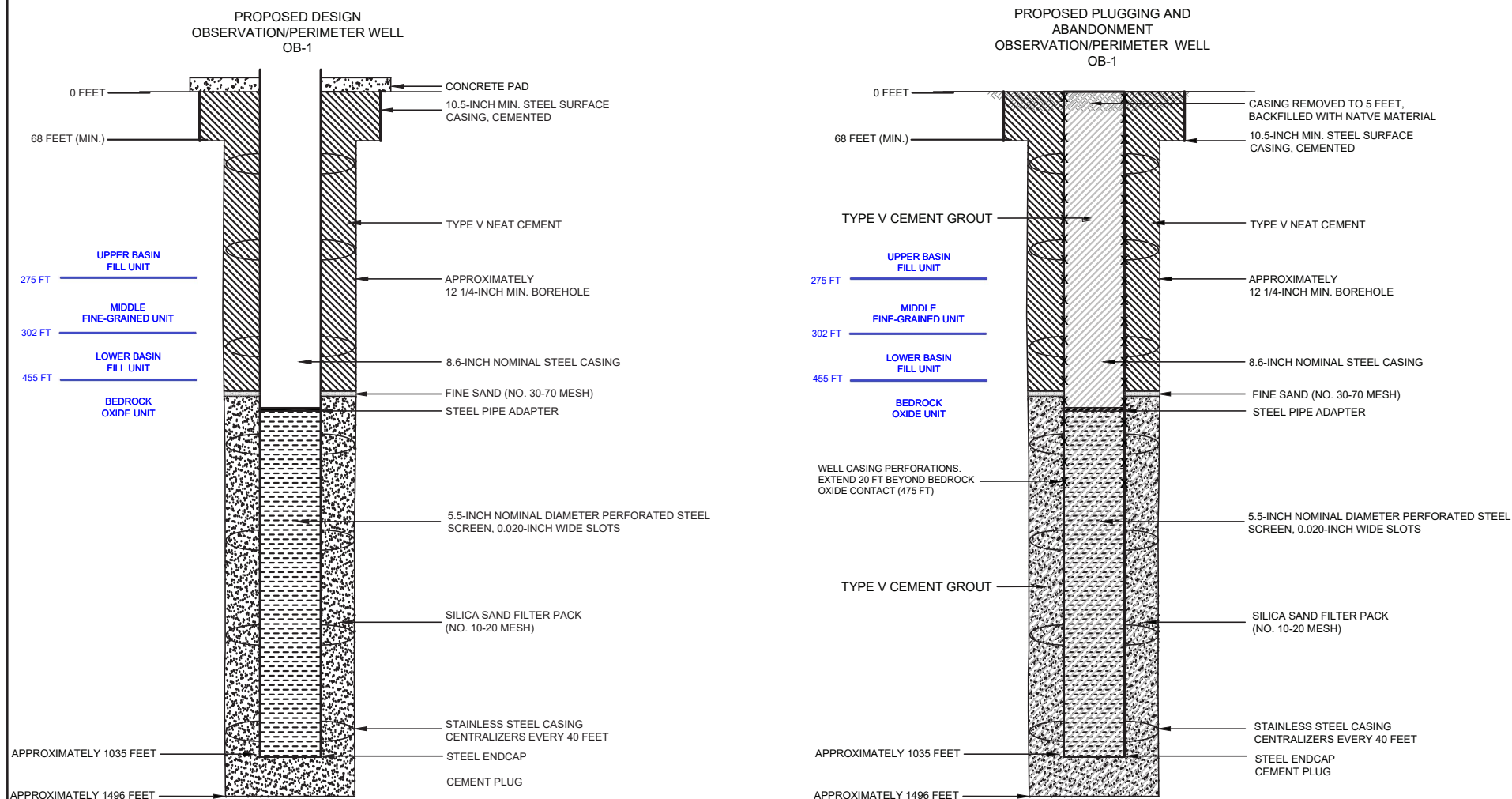
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For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL OB-1 (OW-1, OBS-1, OB-1 CONOCO)

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

OB1-1

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05106588

Surface Location

NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4311982

 ft. from (N/S) Line of quarter section

 ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
 Date Expected to Commence March 2021

- ☐ Report After Work
 Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

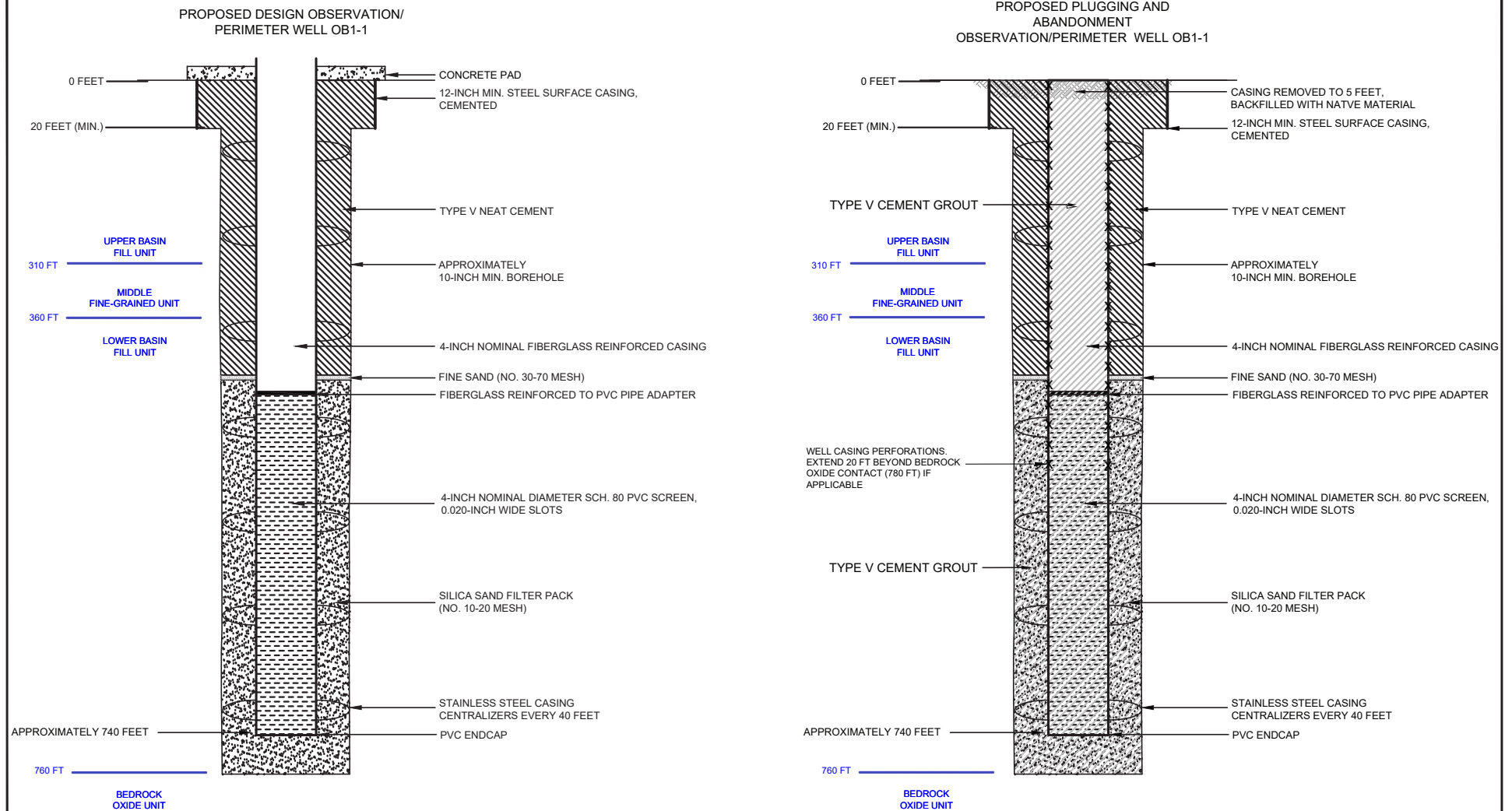
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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NOTES

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FLORENCE COPPER, INC.
 FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL OB1-1

SEPTEMBER 2019
 SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

OB-2

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04974225

Surface Location

NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4303771

 ft. from (N/S) Line of quarter section

 ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
 Date Expected to Commence March 2021

- ☐ Report After Work
 Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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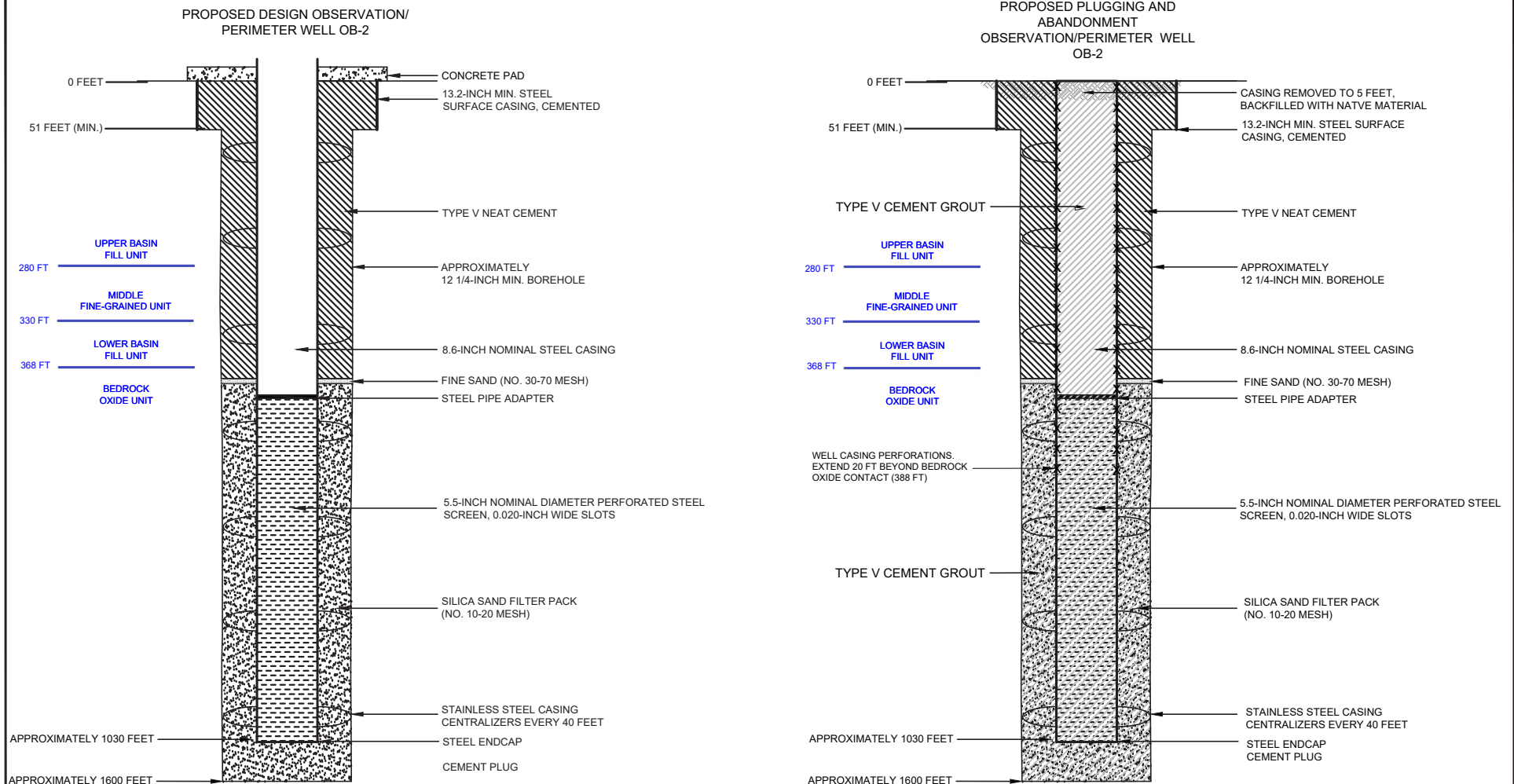
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

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NOTES

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**HALEY
ALDRICH**

FLORENCE COPPER, INC.
 FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL OB-2 (OW-2, OB-2 CONOCO)

SEPTEMBER 2019
 SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

OB2-1

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.0503123

Surface Location

NW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4285464

 ft. from (N/S) Line of quarter section

 ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
 Date Expected to Commence March 2021

- ☐ Report After Work
 Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

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Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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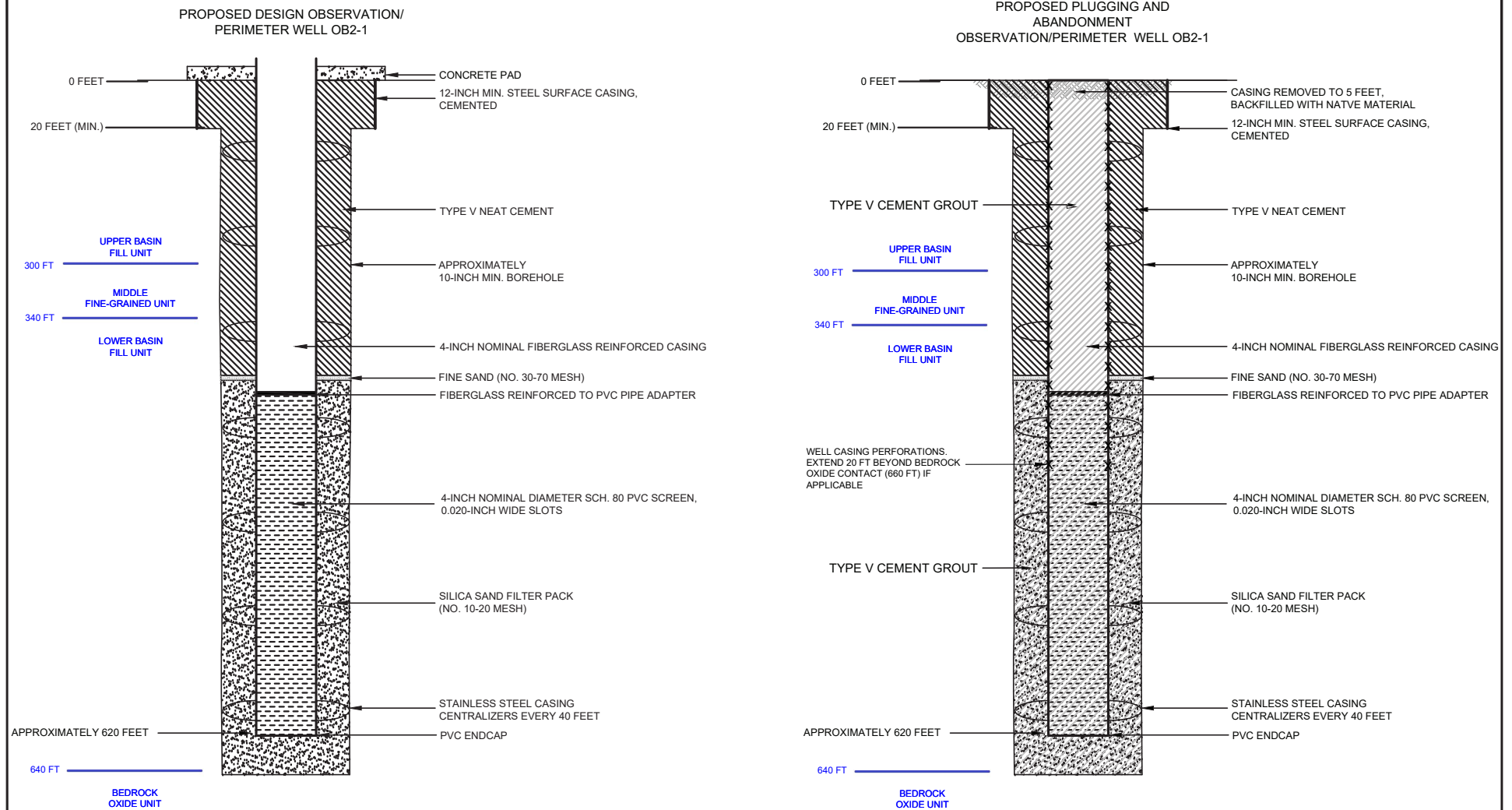
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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

**HALEY
ALDRICH**

FLORENCE COPPER, INC.
 FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL OB2-1

SEPTEMBER 2019
 SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

OB2-2

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04850193

Surface Location

SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4275277

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

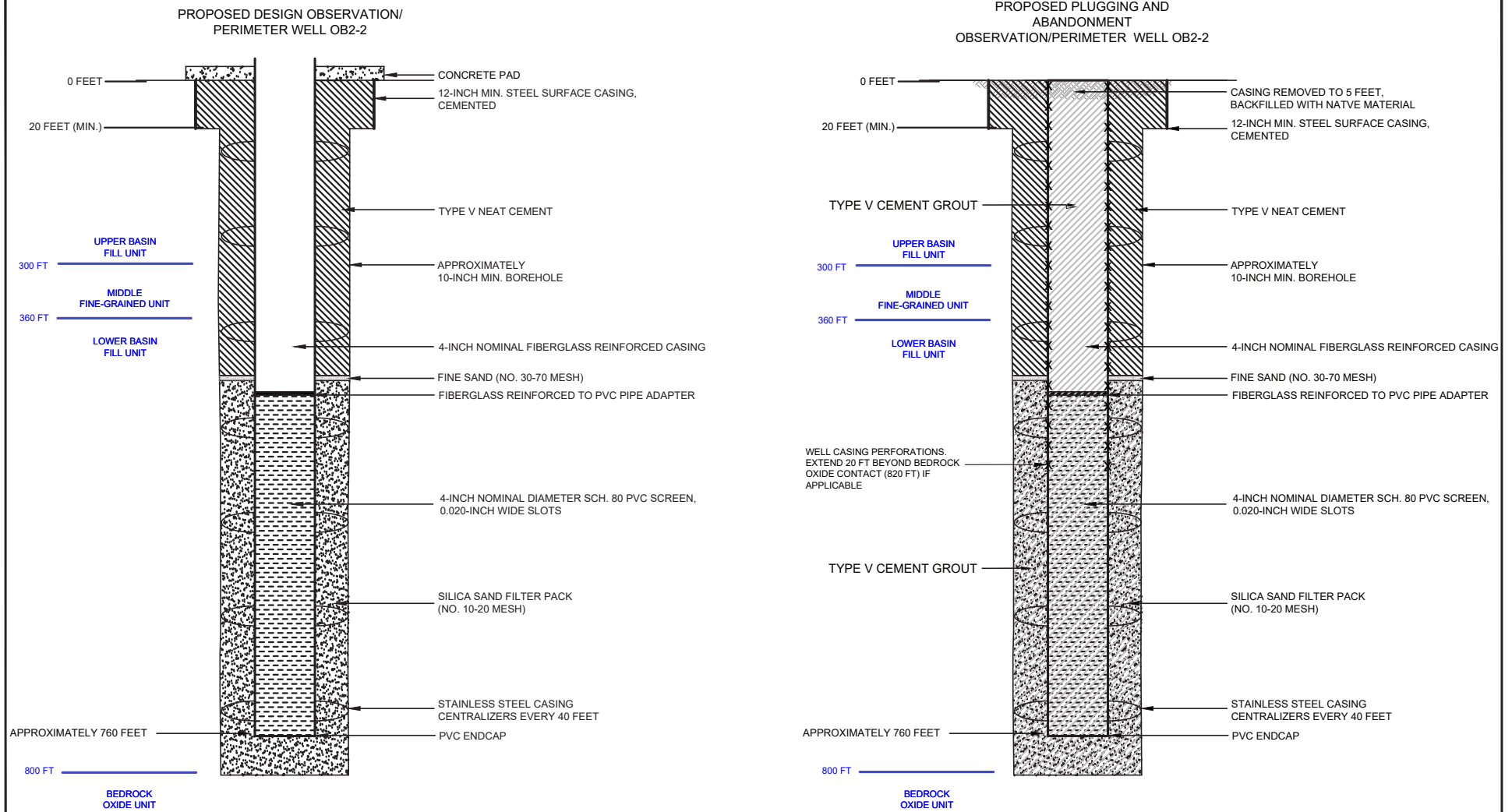
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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NOTES

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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL OB2-2

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

OB-3

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04905308

Surface Location

SE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4319079

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

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TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

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For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

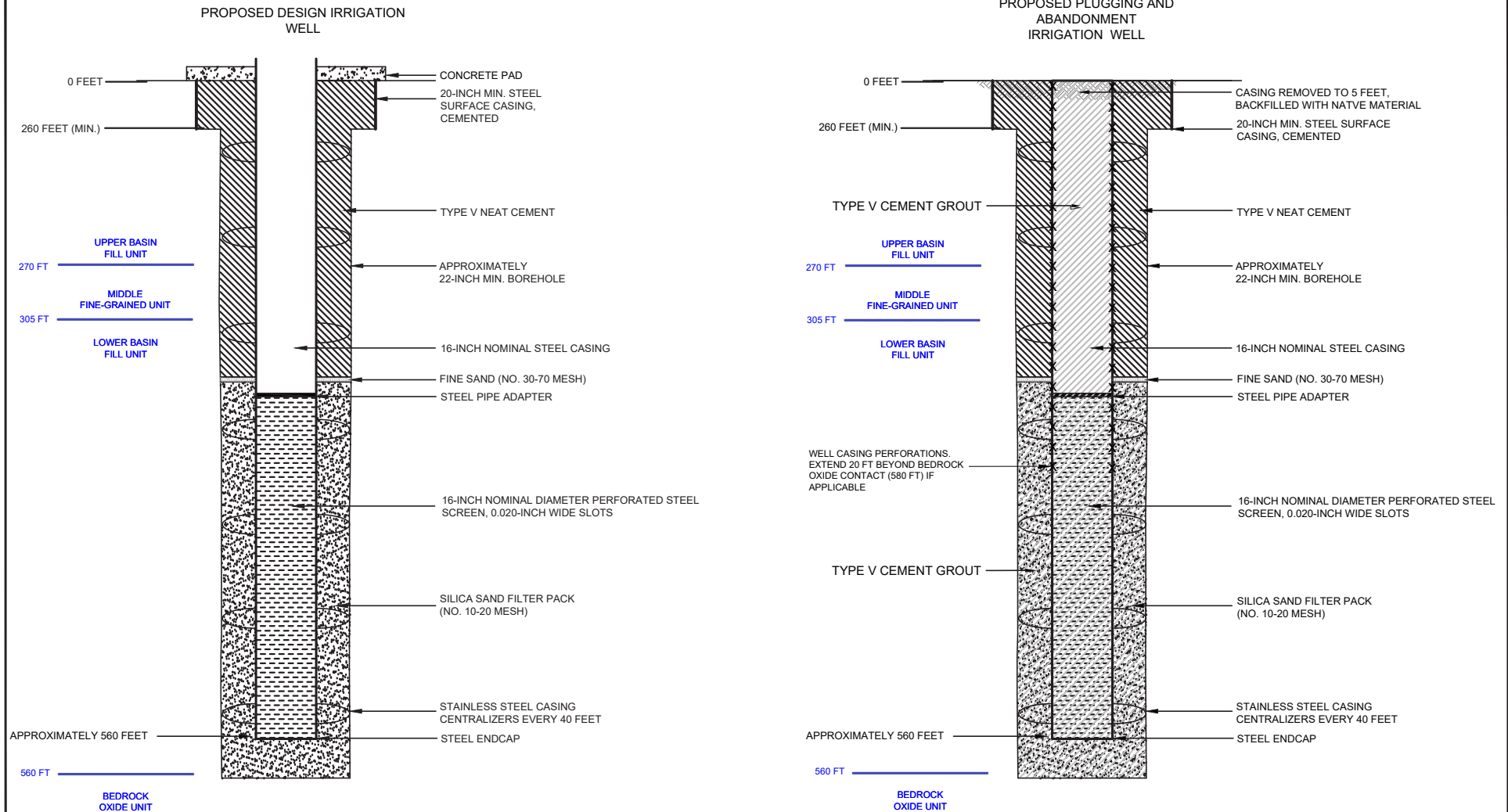
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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

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NOTES

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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC IRRIGATION WELL OB-3 (McFarland 1, OW-3, Mf H20, MFZ)

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

OB-4

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04765116

Surface Location

SE 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4250616

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.

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Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

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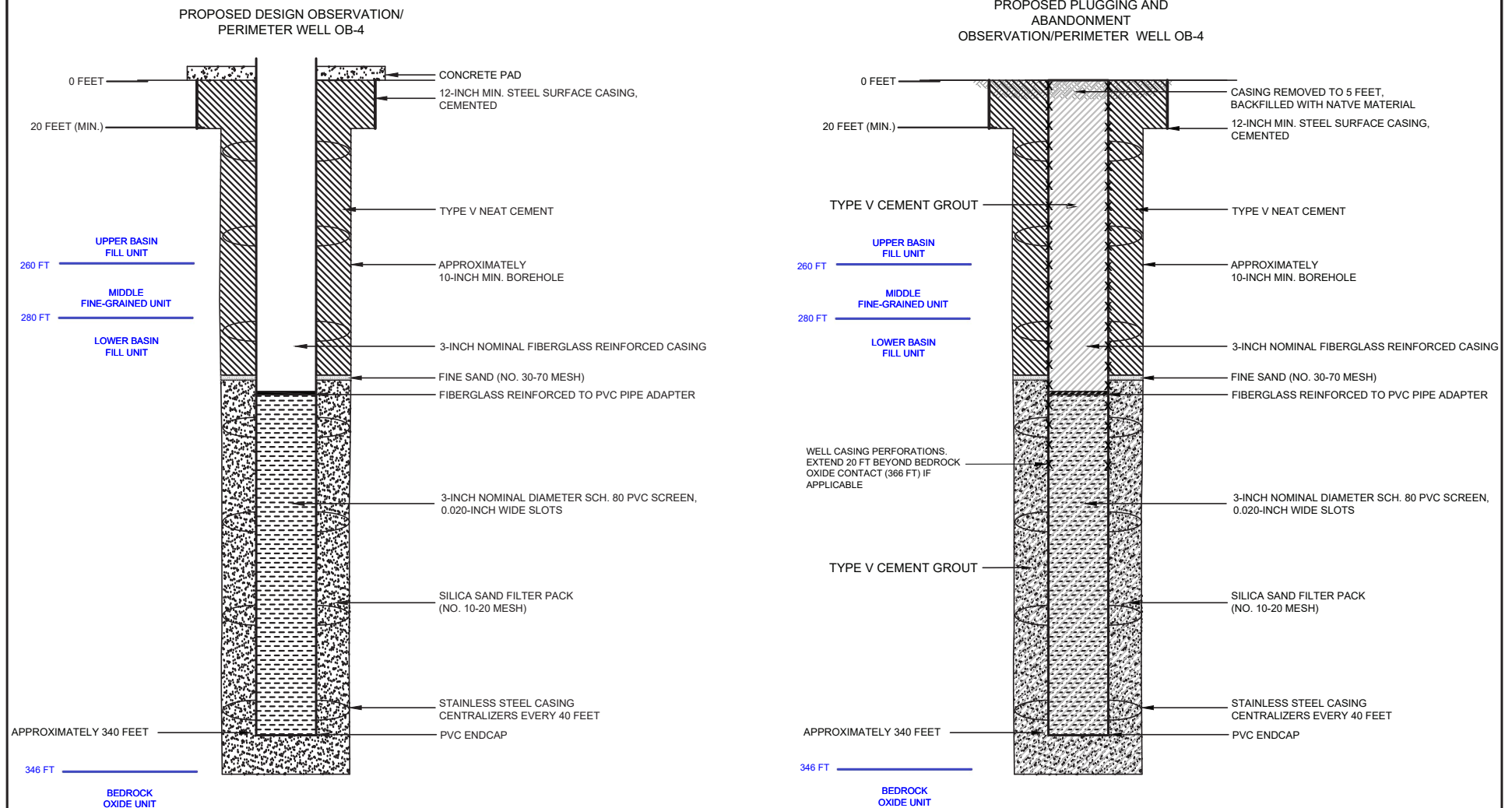
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NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

**HALEY
ALDRICH**

FLORENCE COPPER, INC.
 FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL OB-4

SEPTEMBER 2019
 SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

OB-5

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04745309

Surface Location

SE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4302781

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

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API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

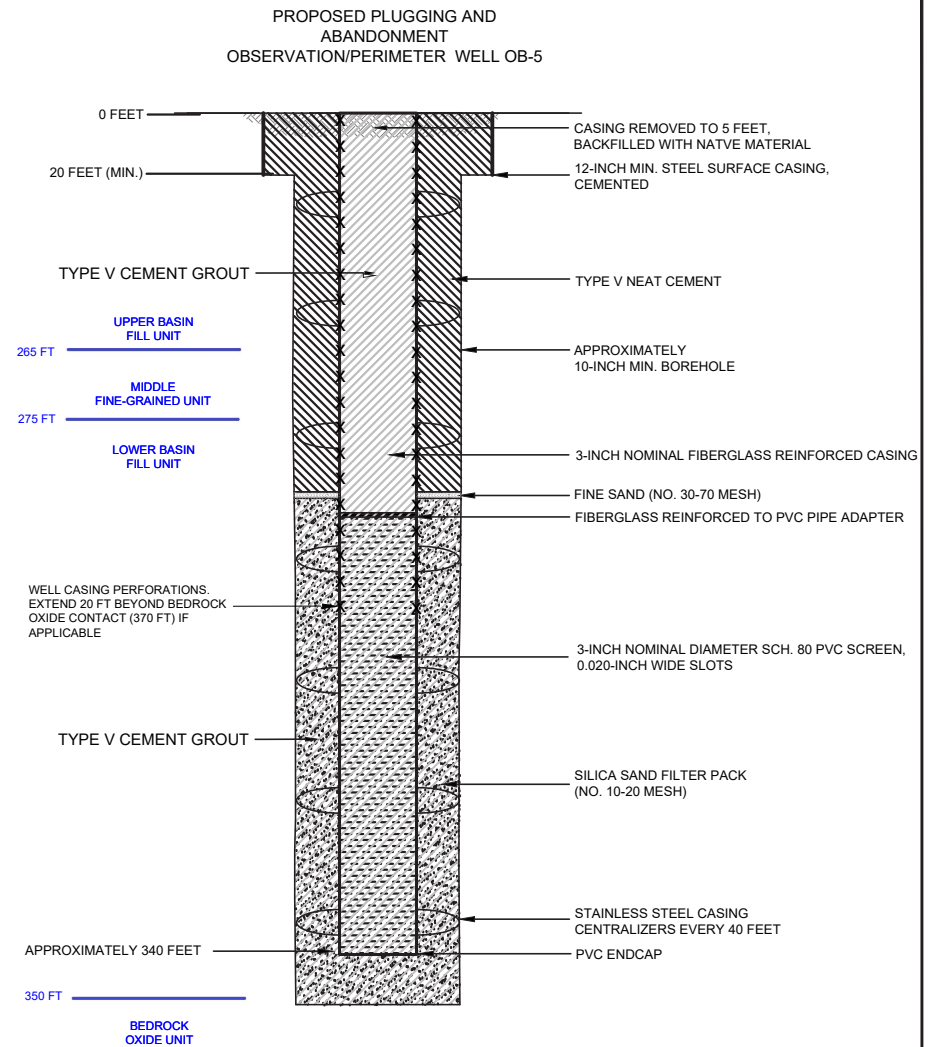
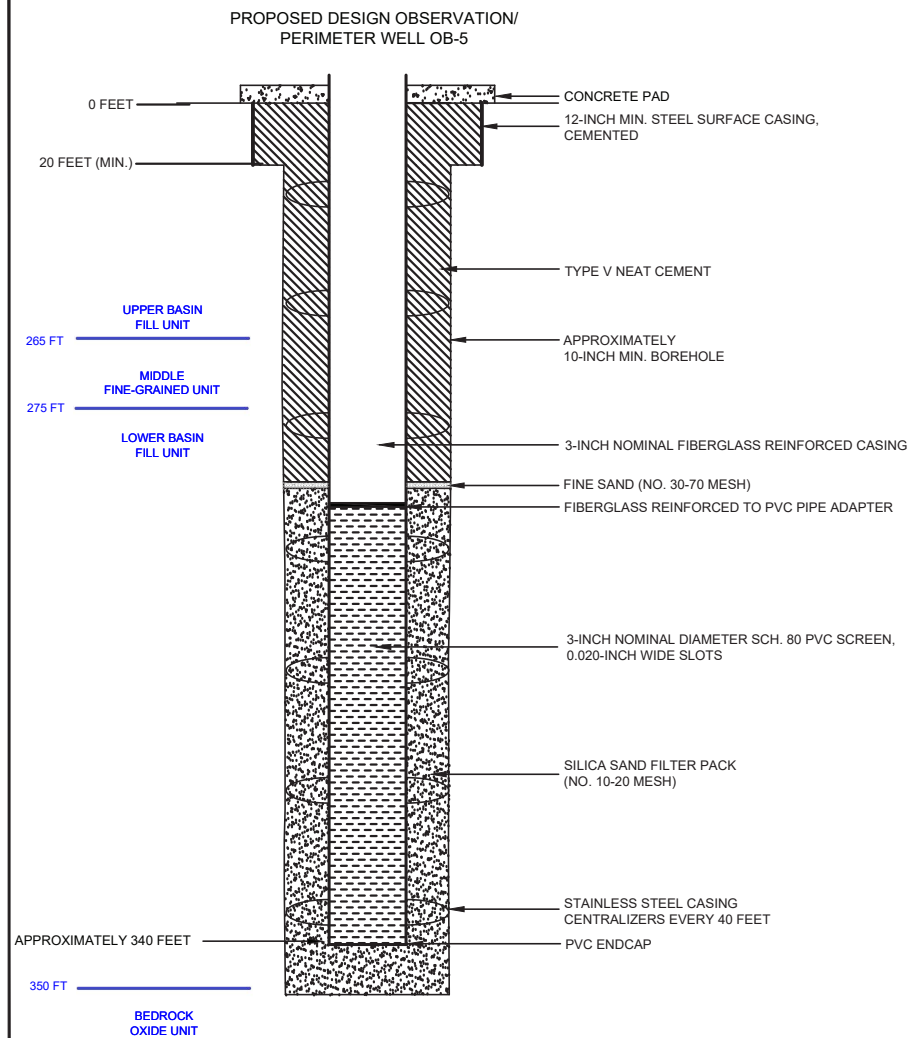
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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HALEY
ALDRICH

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC
OBSERVATION/PERIMETER WELL
OB-5

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

OB-6

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05121877

Surface Location

NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4318514

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.

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A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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FULL WELL NAME: Enter the full name of the well or project.

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Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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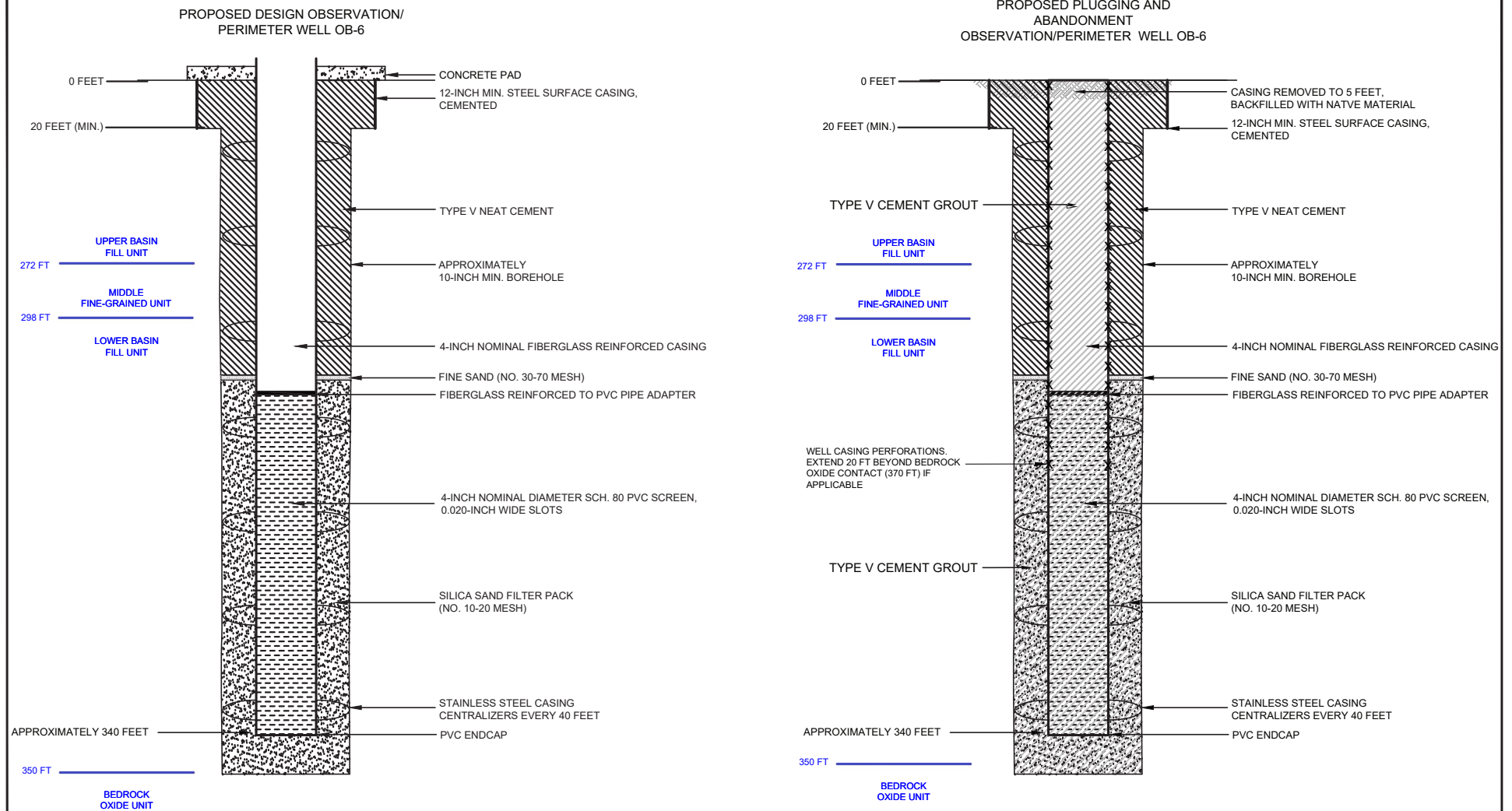
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**HALEY
ALDRICH**

FLORENCE COPPER, INC.
 FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL OB-6

SEPTEMBER 2019
 SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

OB7-1

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04839081

Surface Location

SE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4308144

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

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Date Signed

10/3/2019

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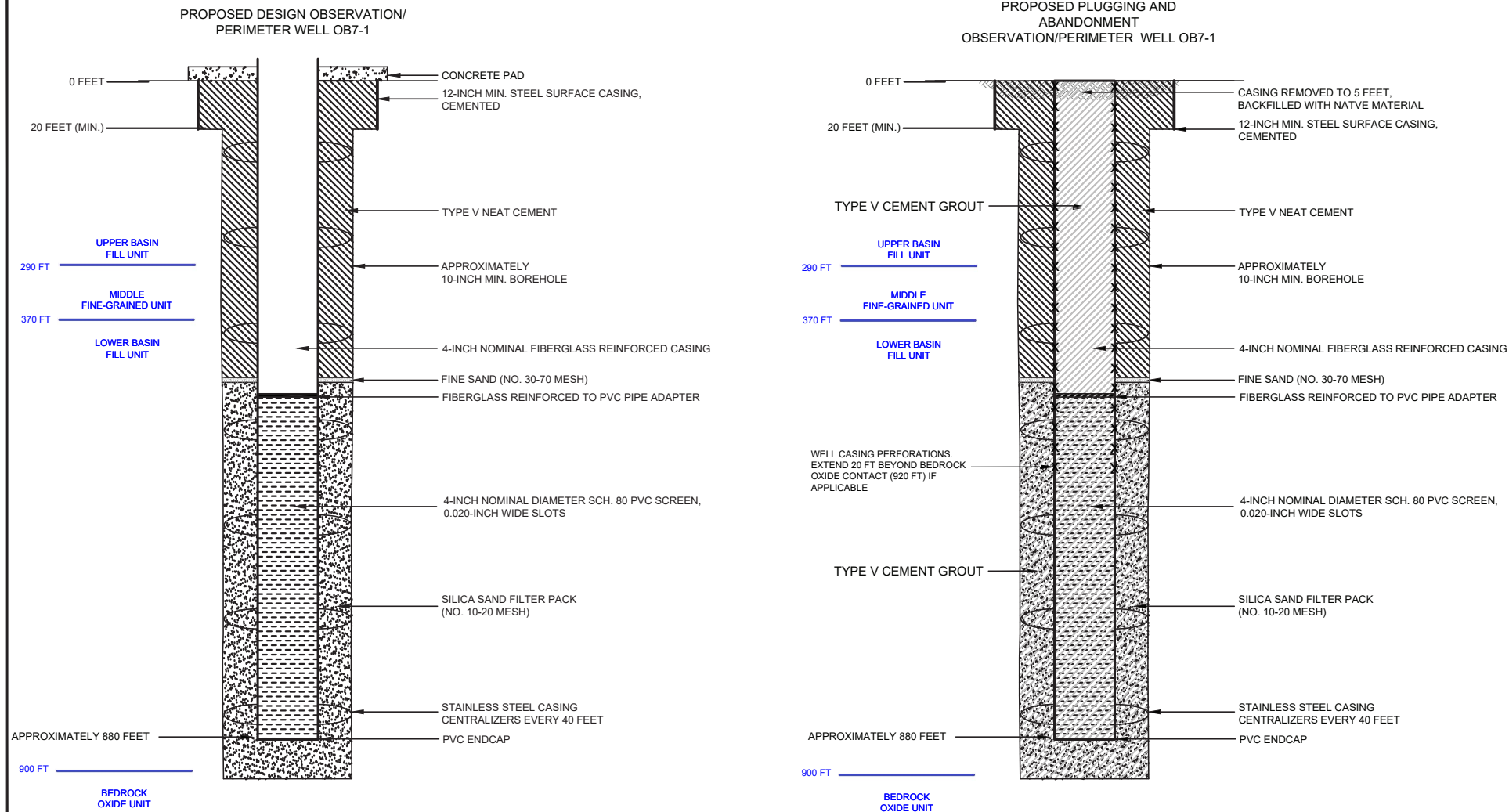
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PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

**HALEY
ALDRICH**

FLORENCE COPPER, INC.
 FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL OB7-1

SEPTEMBER 2019
 SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

P5-O

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04629749

Surface Location

SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4287797

 ft. from (N/S) Line of quarter section

 ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
 Date Expected to Commence March 2021

- ☐ Report After Work
 Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

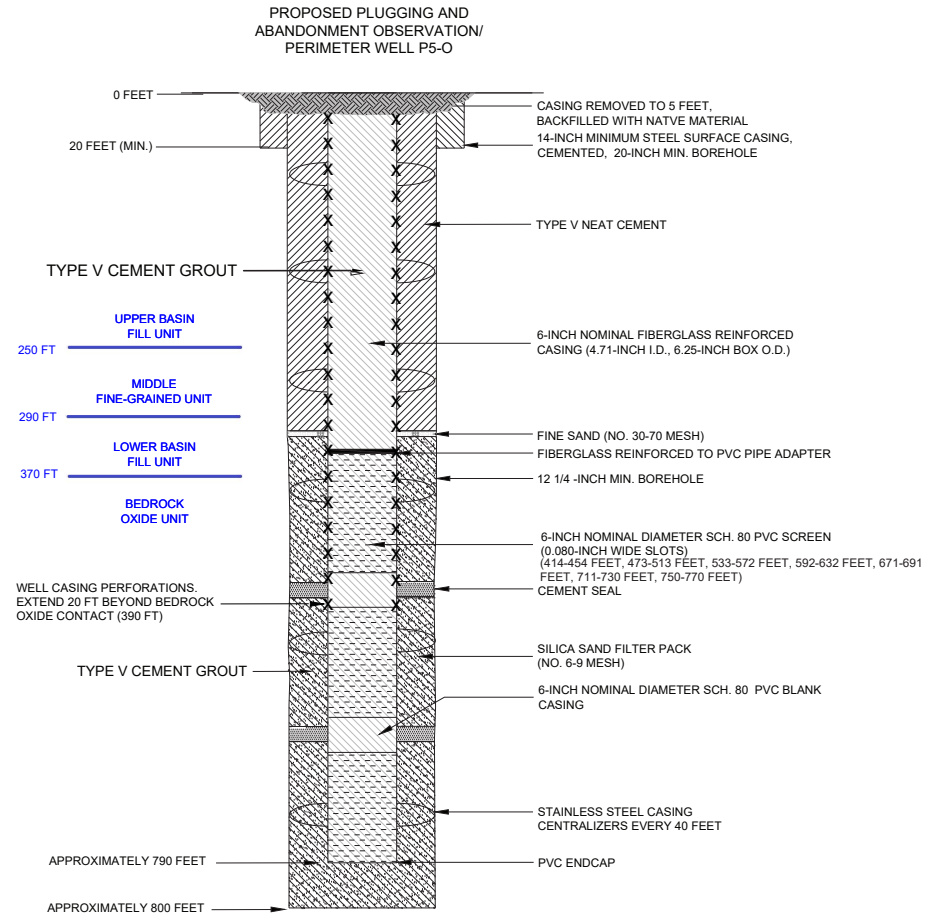
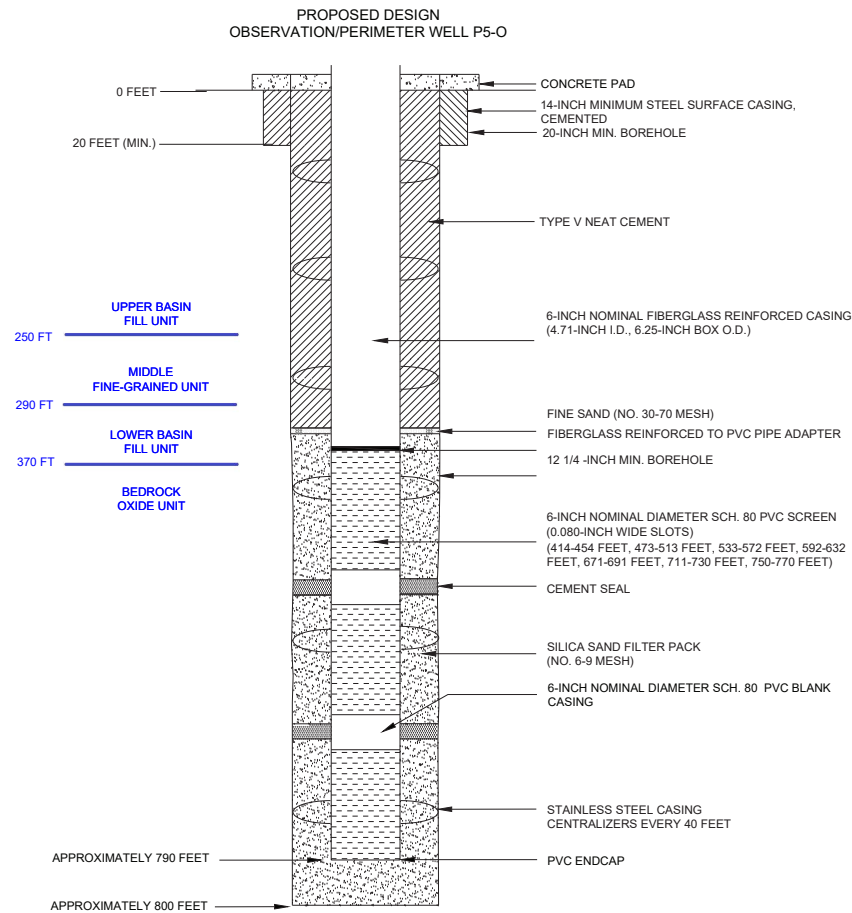
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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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NOTES

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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL P5-O

SCALE: AS SHOWN
SEPTEMBER 2019

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

P8.1-O

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05206105

Surface Location

NW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4290592

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.

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A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

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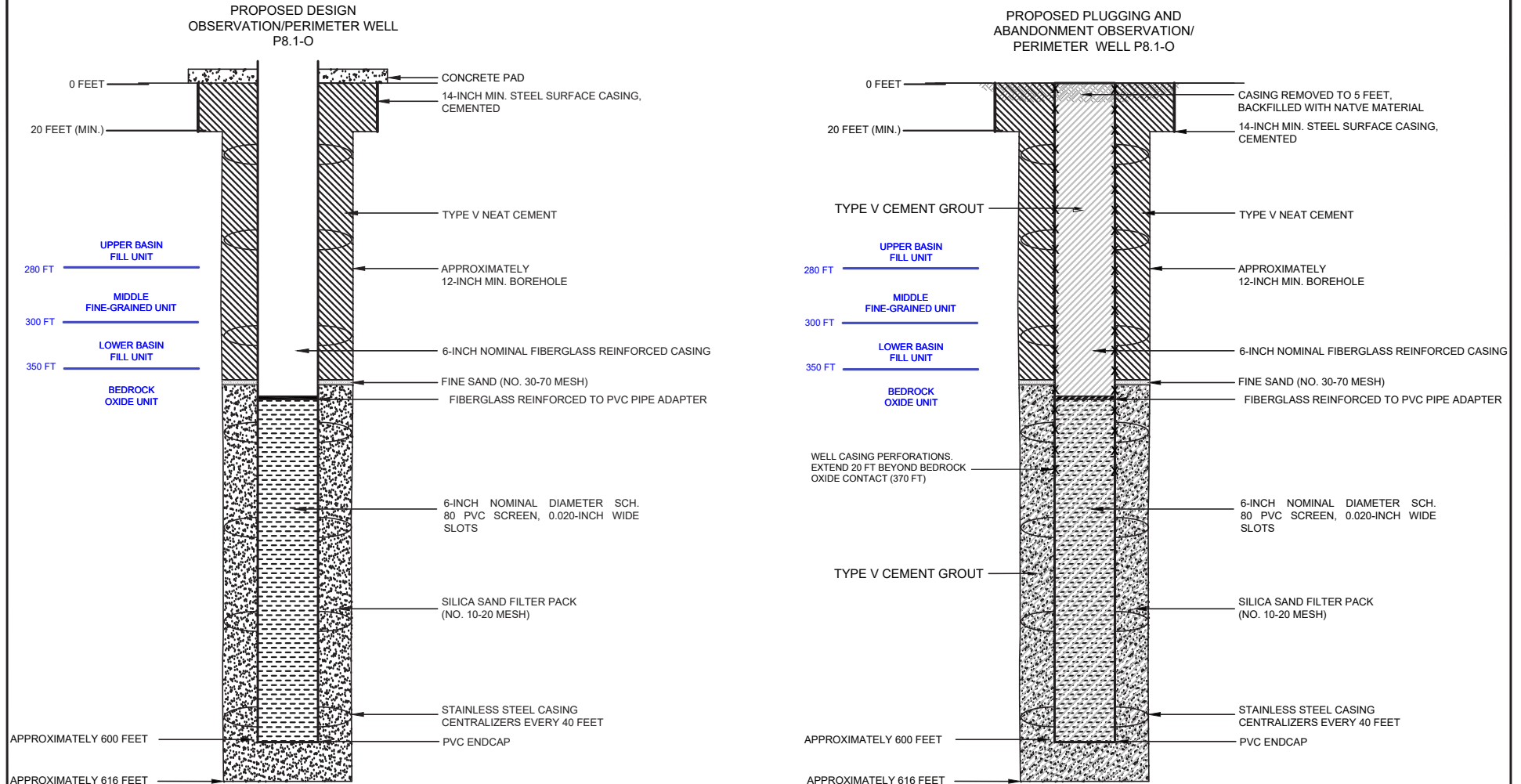
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**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL P8.1-O

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

P8-GU

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05220923

Surface Location

NW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4294184

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
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Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

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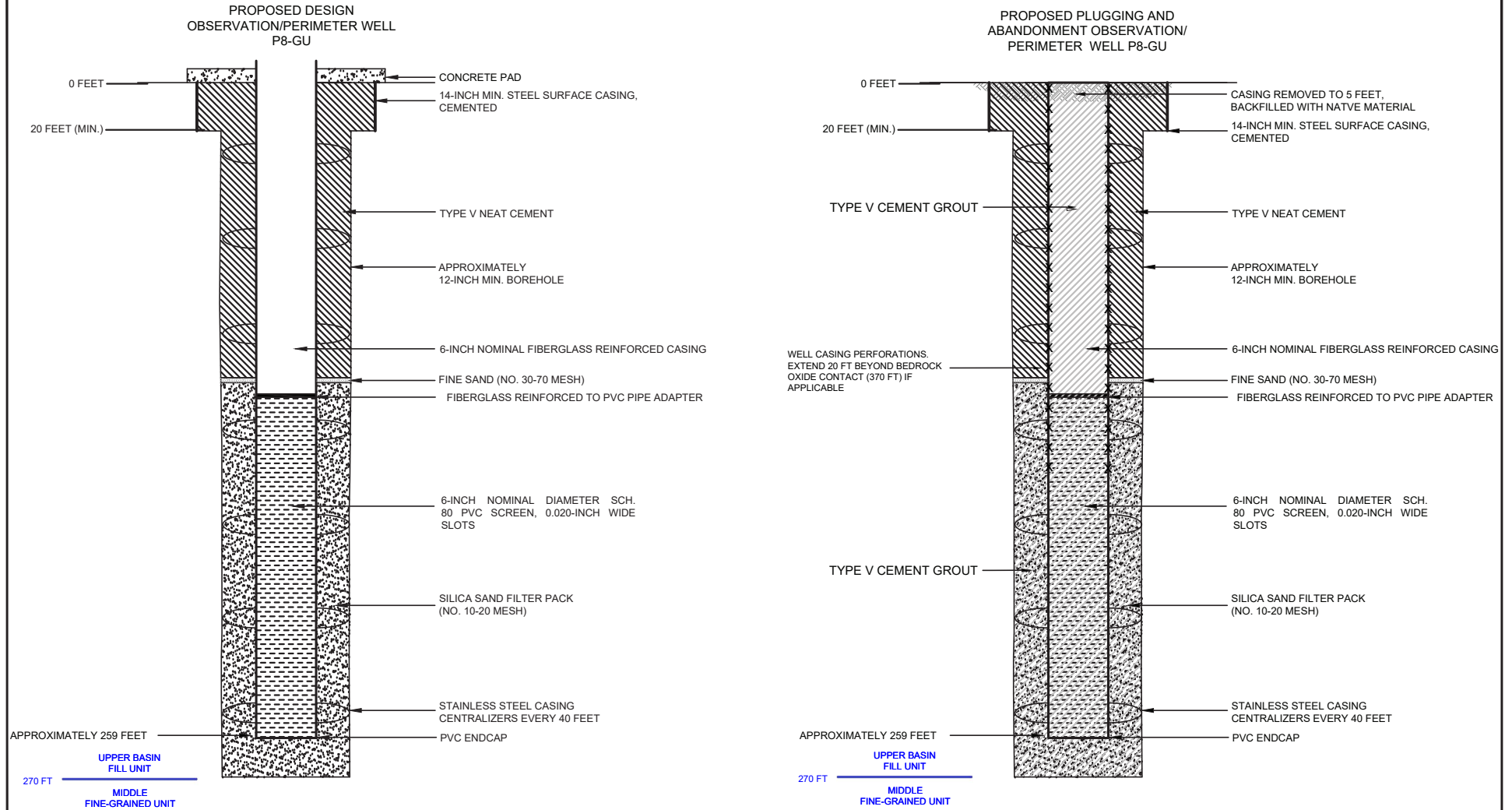
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PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL P8-GU

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

P8.2-O

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05212228

Surface Location

NW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4347703

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

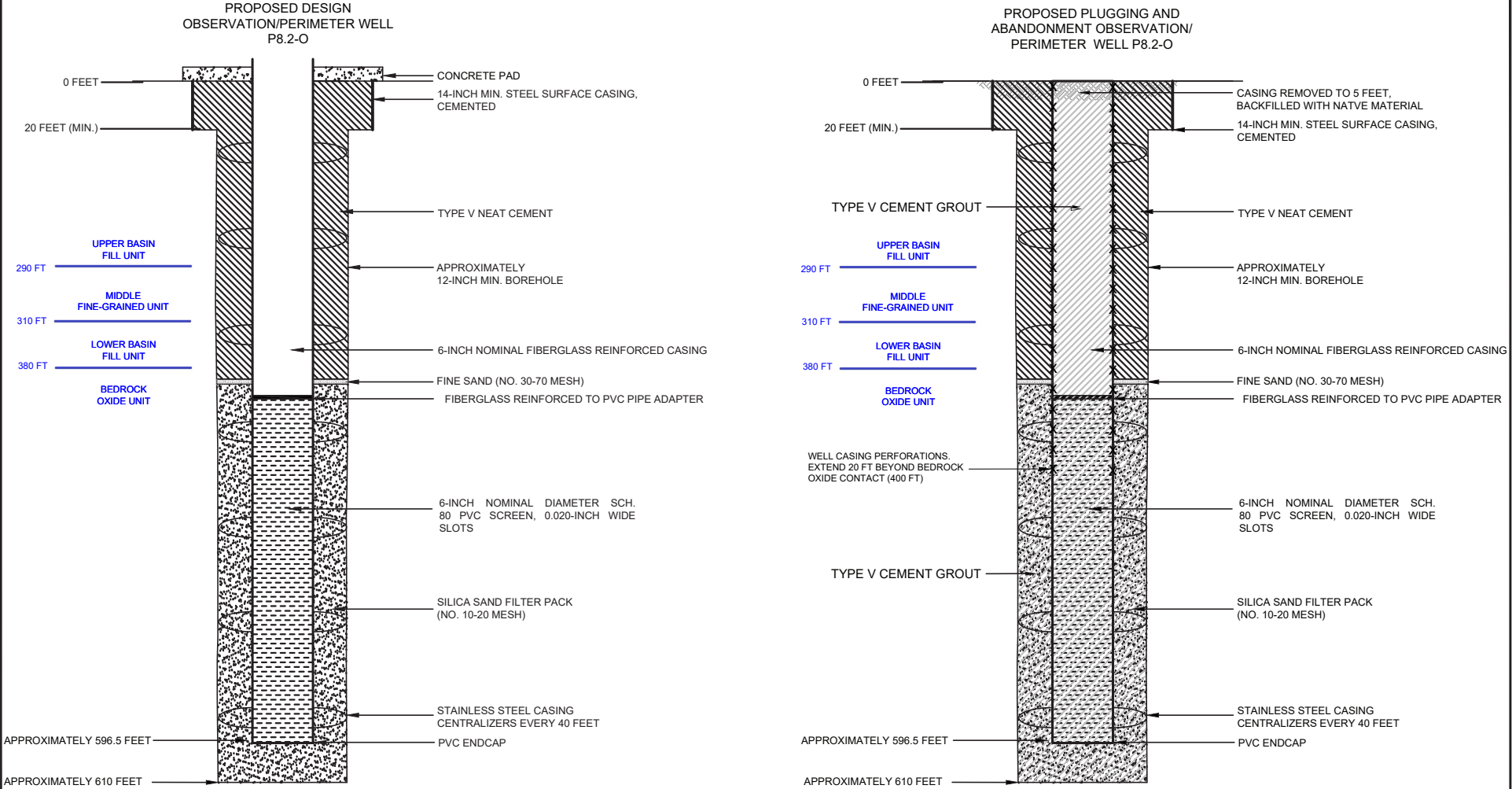
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

**ABANDONMENT SCHEMATIC
OBSERVATION/PERIMETER
WELL P8.2-O**

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

P12-O

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04634187

Surface Location

SE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4321274

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

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The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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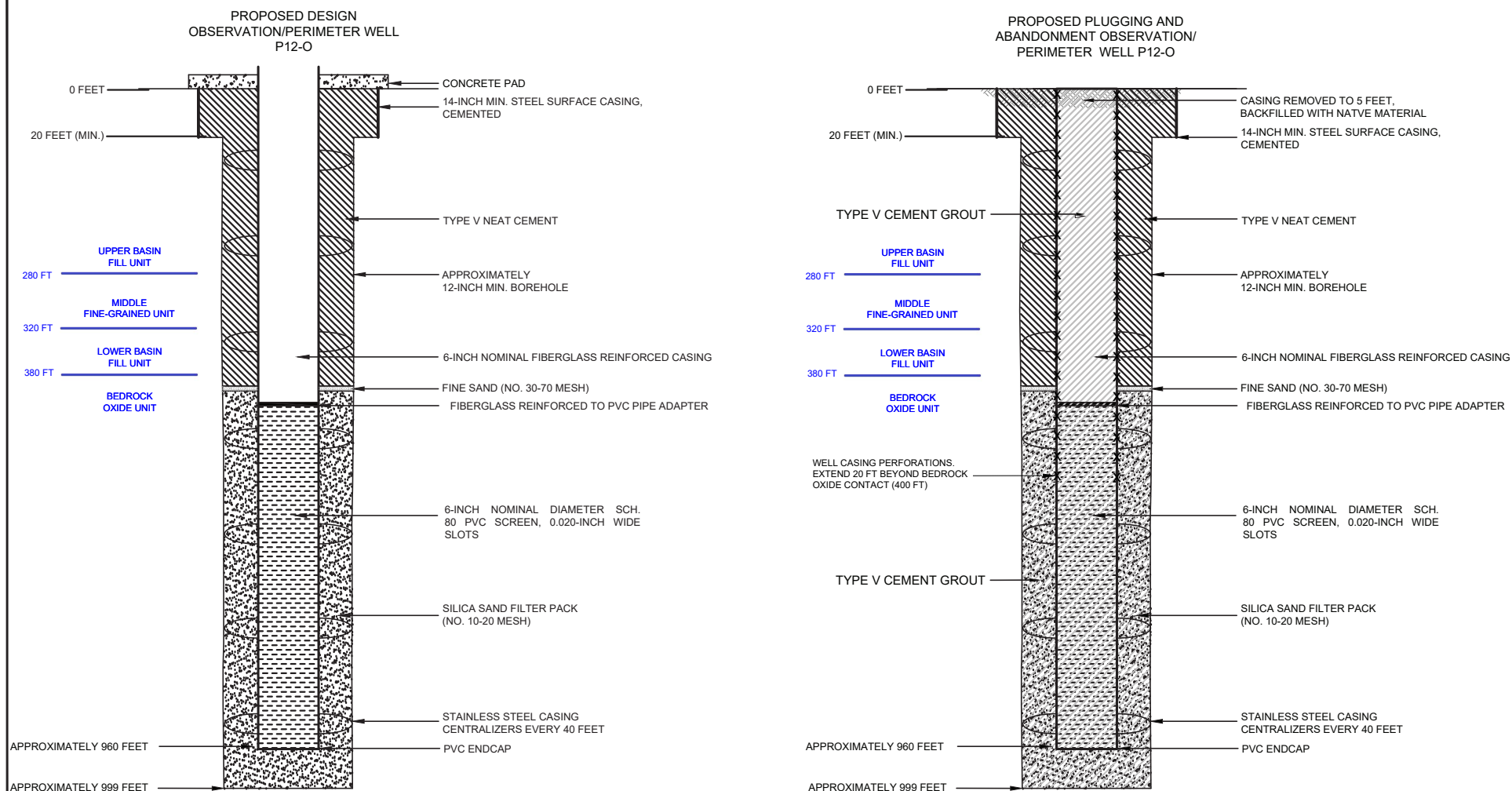
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**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL P12-O

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

P13.1-O

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05210103

Surface Location

NW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4351053

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

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Signature

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10/3/2019

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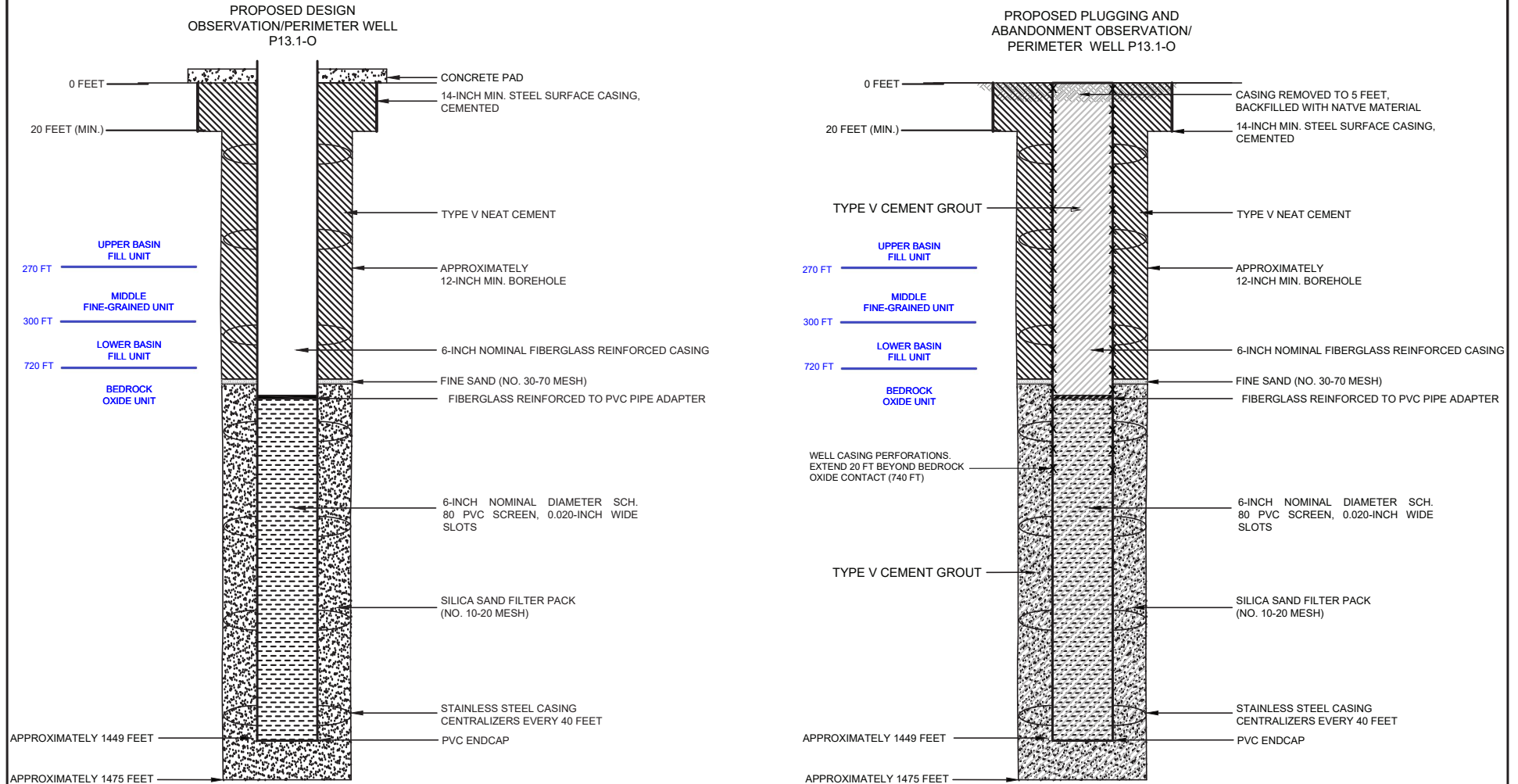
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NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL P13.1-O

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

P13.2-O

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05212228

Surface Location

NW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4347703

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

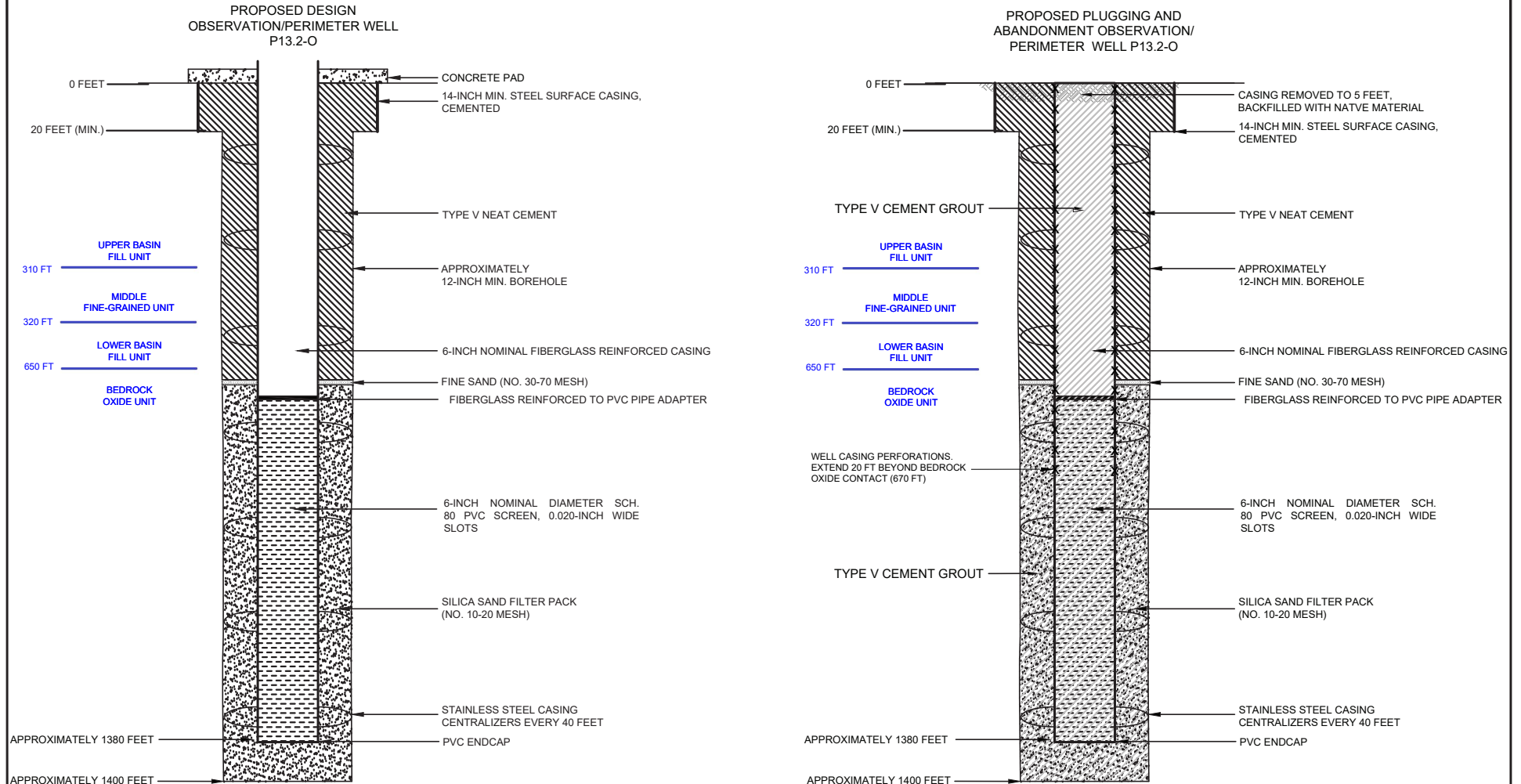
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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL P13.2-O

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

P13-GL

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05211091

Surface Location

NW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4355984

 ft. from (N/S) Line of quarter section

 ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
 Date Expected to Commence March 2021

- ☐ Report After Work
 Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

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Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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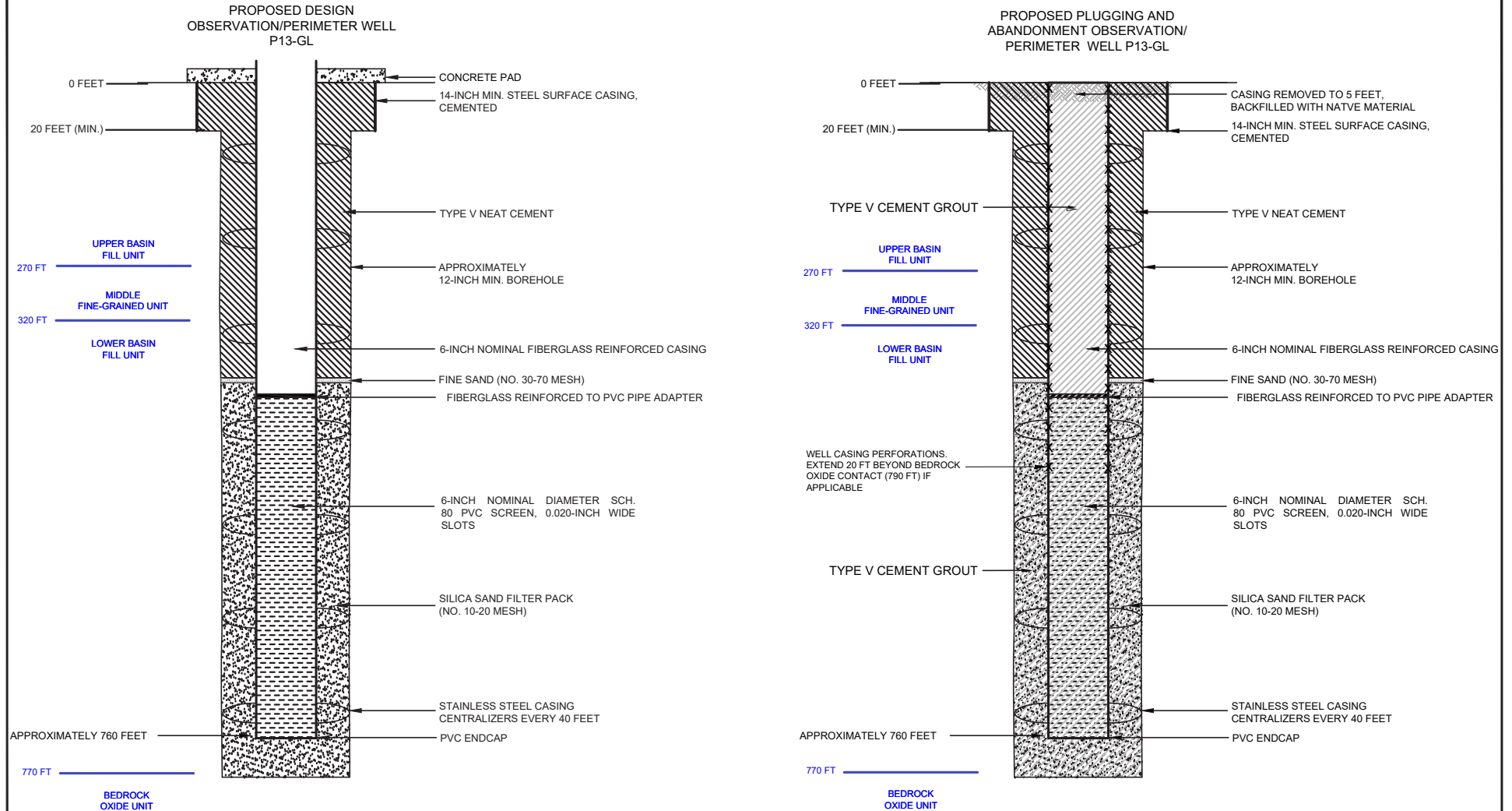
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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL P13-GL

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

P15-GL

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04835918

Surface Location

SW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4352758

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

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Dan Johnson, VP - General Manager

Signature

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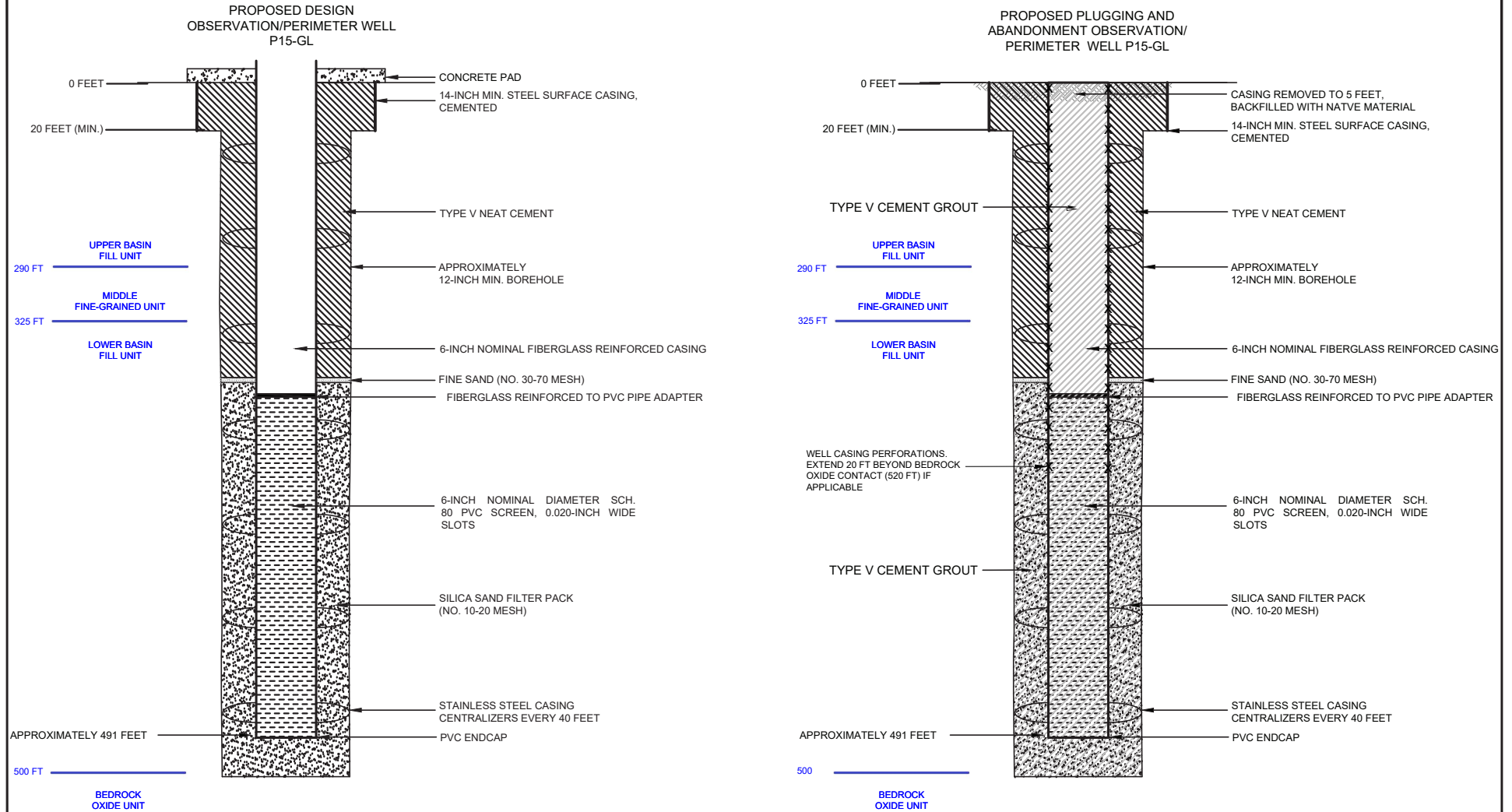
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PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL P15-GL

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

P15-O

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04833274

Surface Location

SW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4349783

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

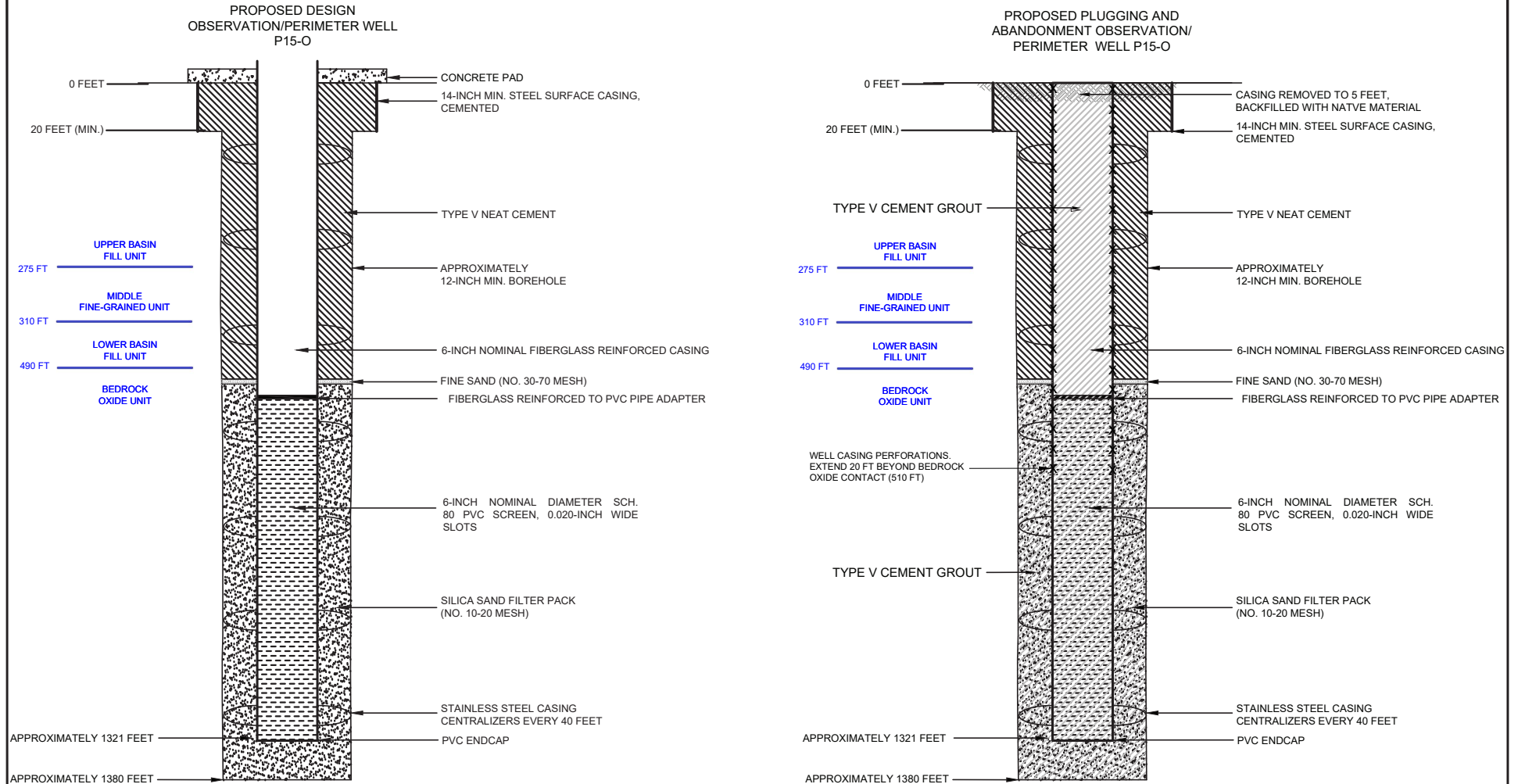
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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**HALEY
ALDRICH**

FLORENCE COPPER, INC.
 FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL P15-O

SEPTEMBER 2019
 SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

P19.1-O

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05359177

Surface Location

SE 1/4 of NW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4322359

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.

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A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

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I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

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WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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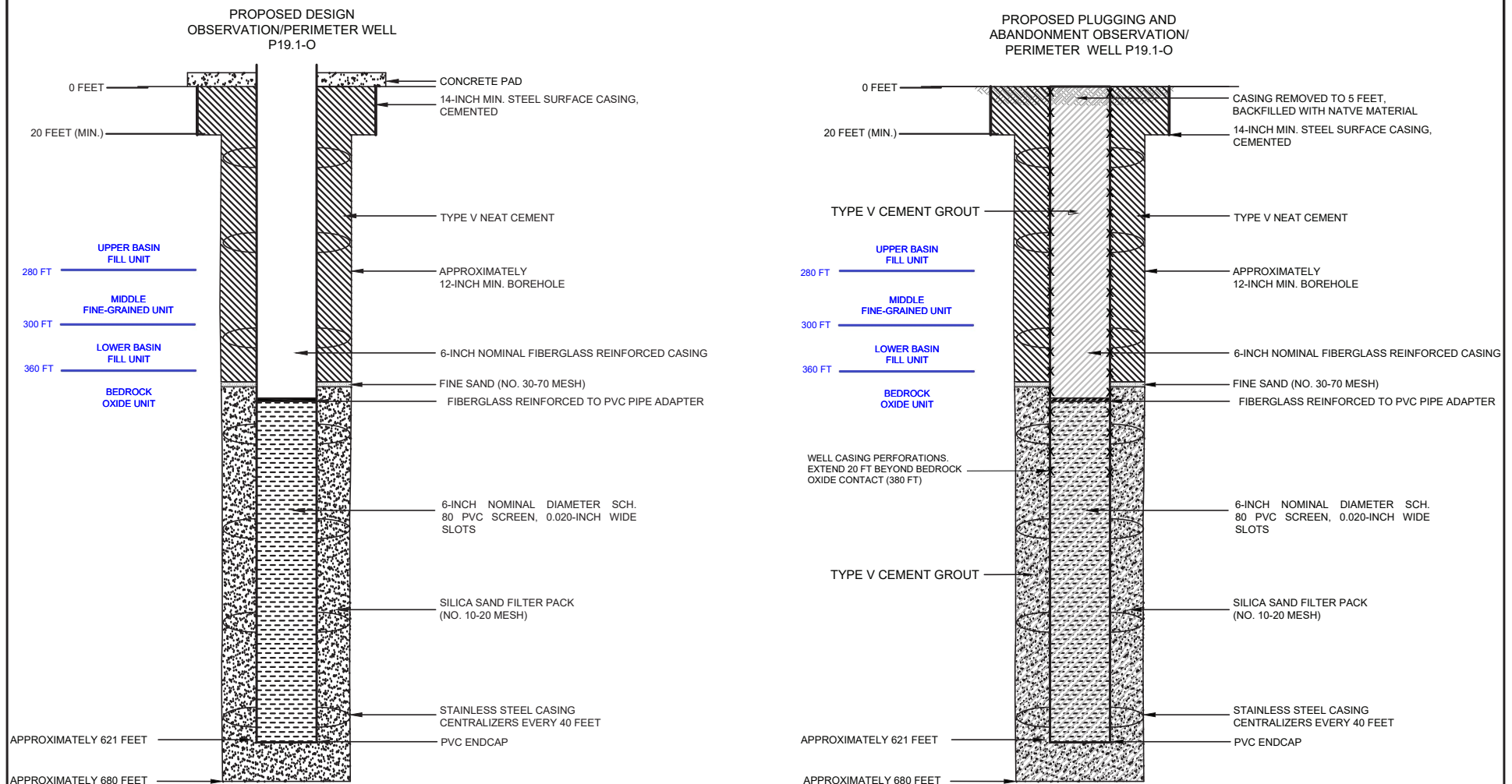
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**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL P19.1-O

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

P19.2-O

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05377851

Surface Location

SE 1/4 of NW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4323354

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

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Signature

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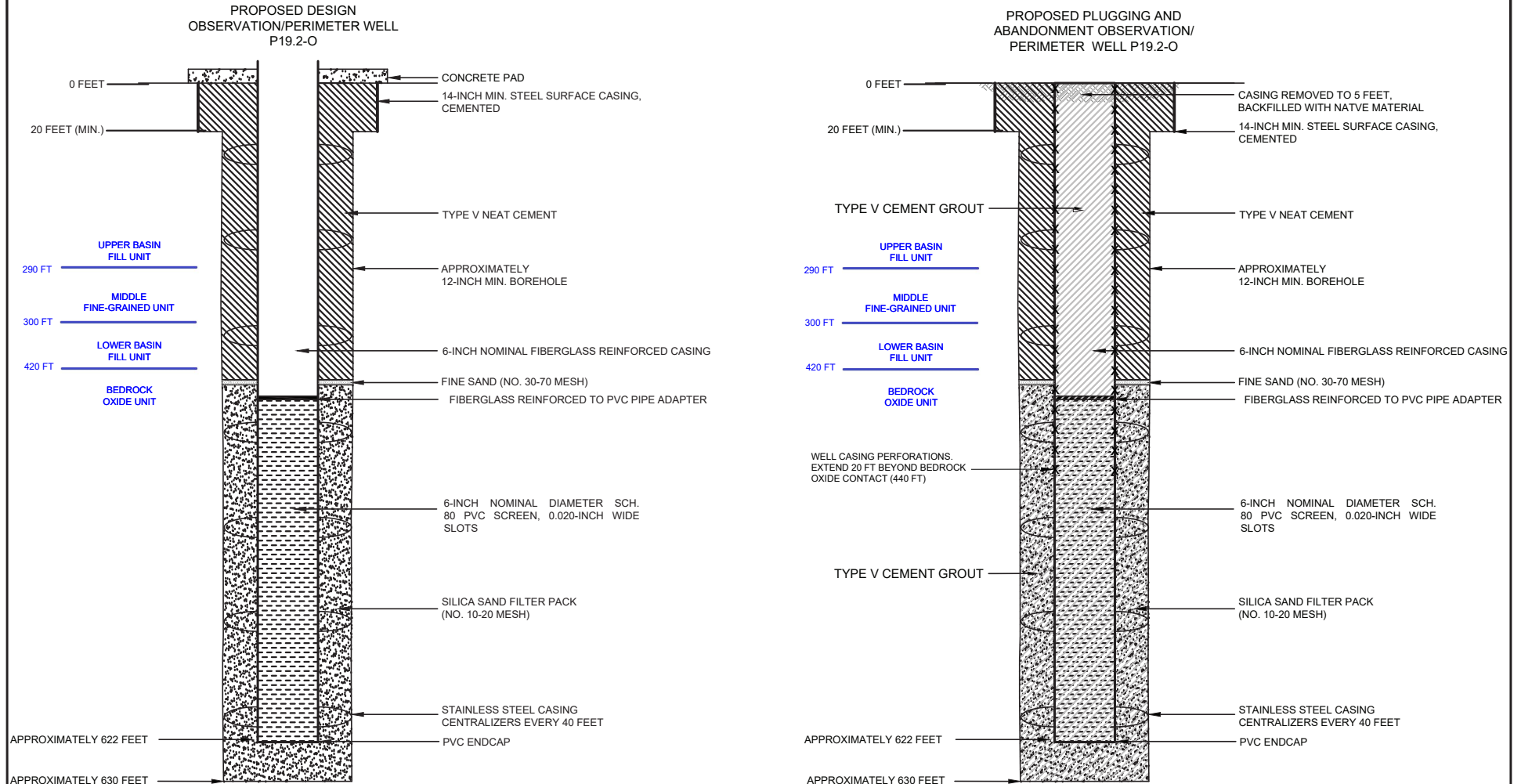
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NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL P19.2-O

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

P28.1-O

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04864642

Surface Location

SE 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4238744

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

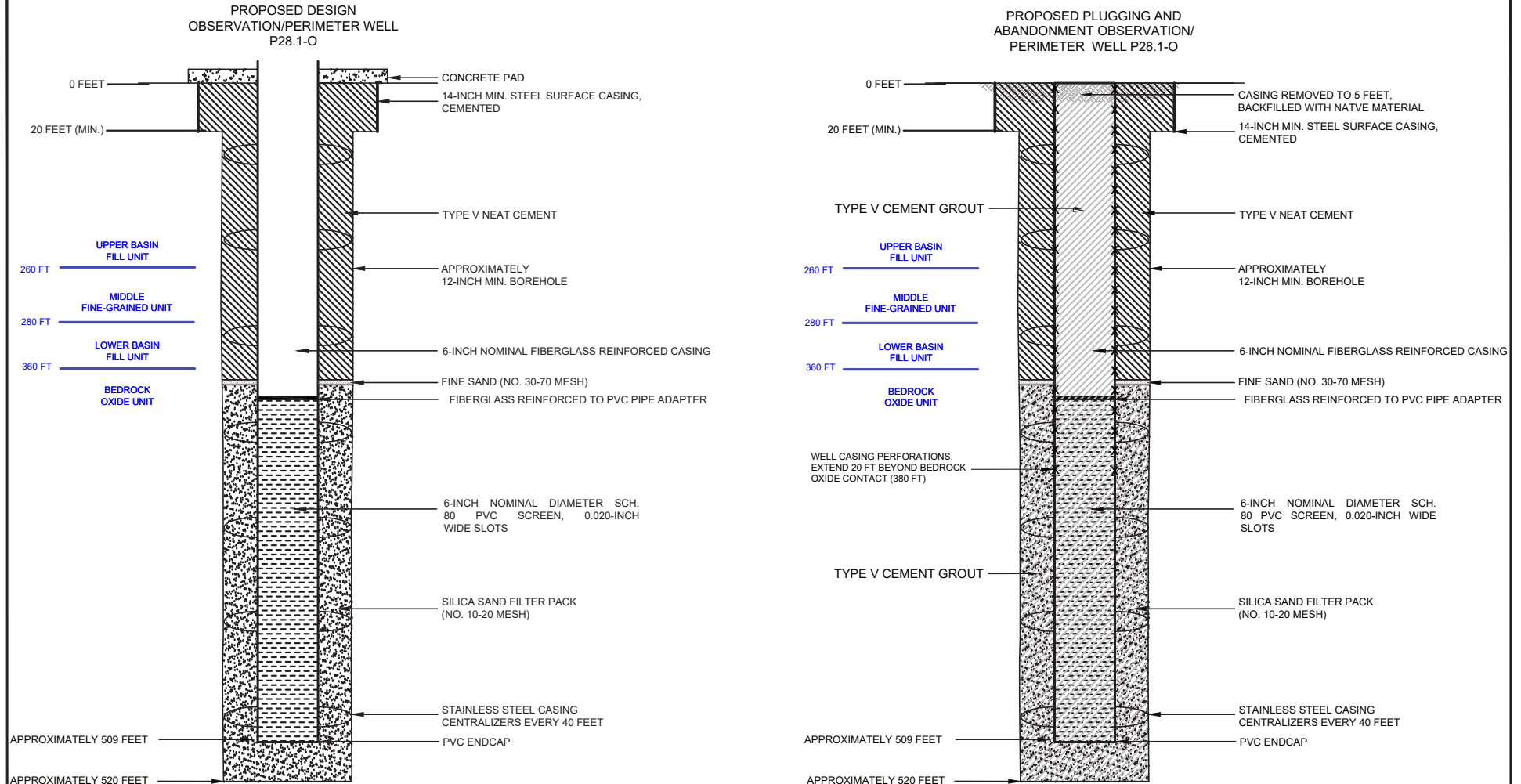
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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL P28.1-O

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



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Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

P28.2-O

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04852861

Surface Location

SE 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4234837

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
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Date Signed

10/3/2019

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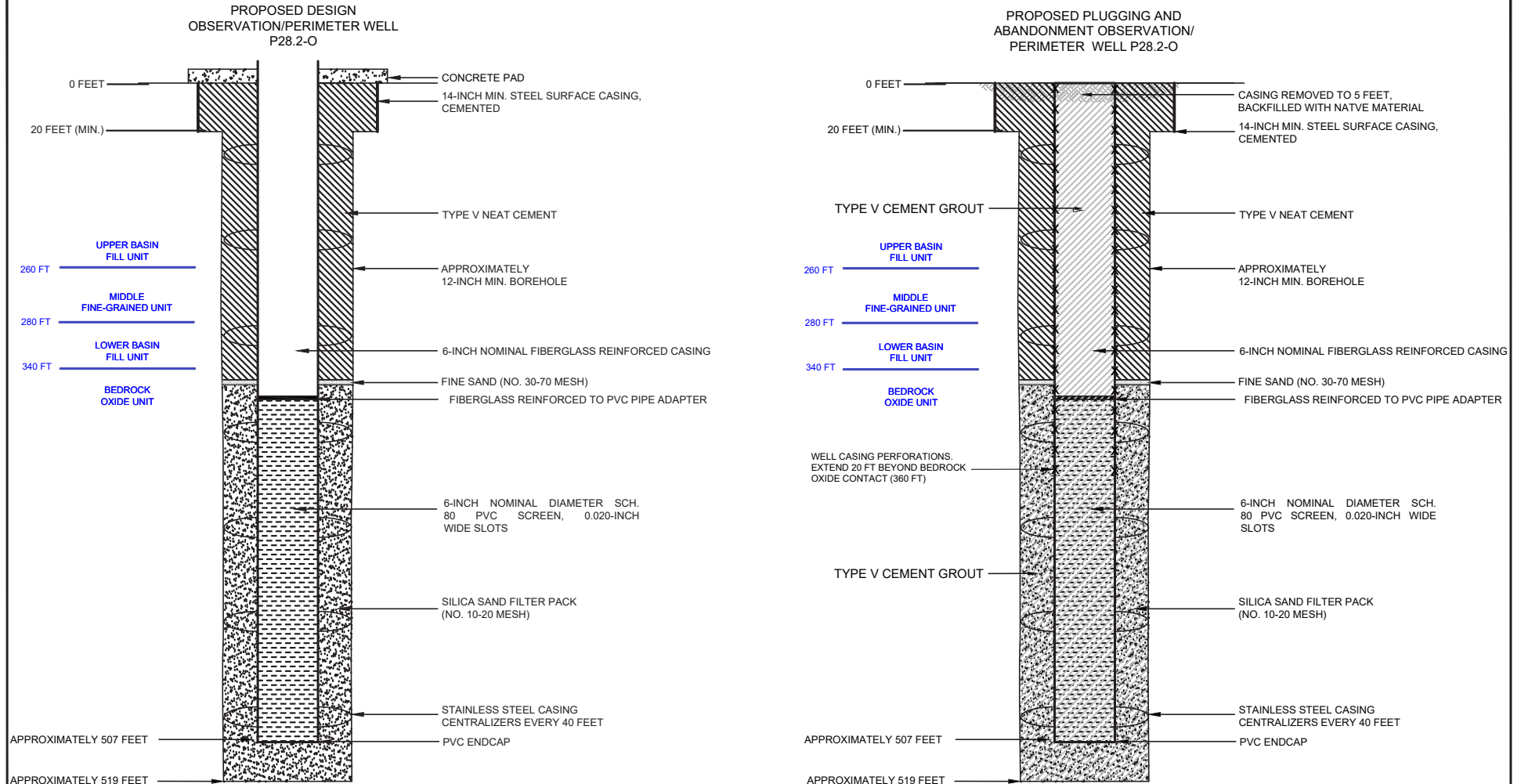
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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL P28.2-O

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

P28-GL

State

Arizona

County

Pinal

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Latitude 33.0485829

Surface Location

SE 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4235895

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

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☐ Class II
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☐ Class V

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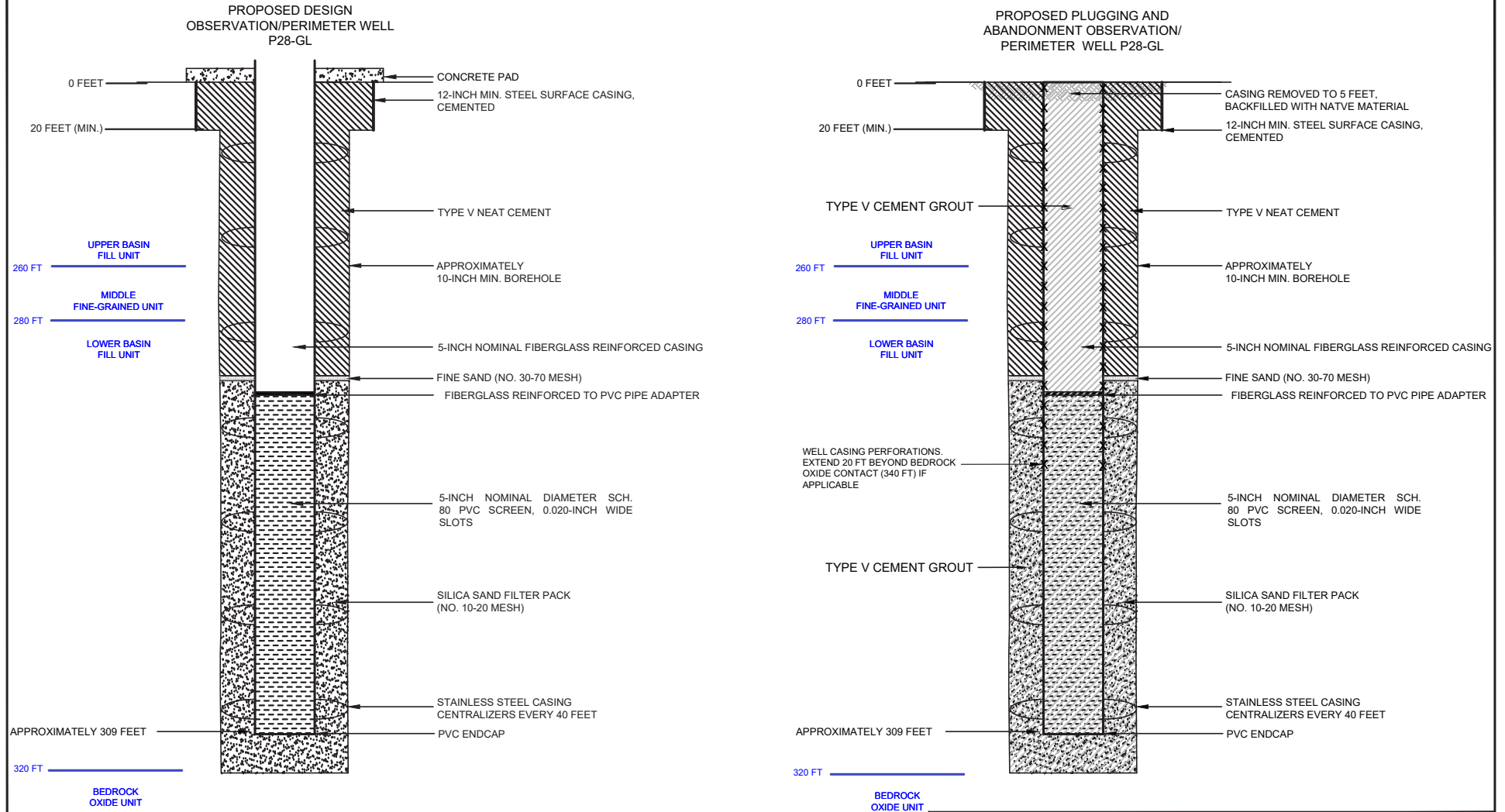
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PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL P28-GL

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

P39-O

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.0446688

Surface Location

NE 1/4 of NW 1/4 of Section 33 Township 4S Range 9E

Longitude -111.4300826

 ft. from (N/S) Line of quarter section

 ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
 Date Expected to Commence March 2021

- ☐ Report After Work
 Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

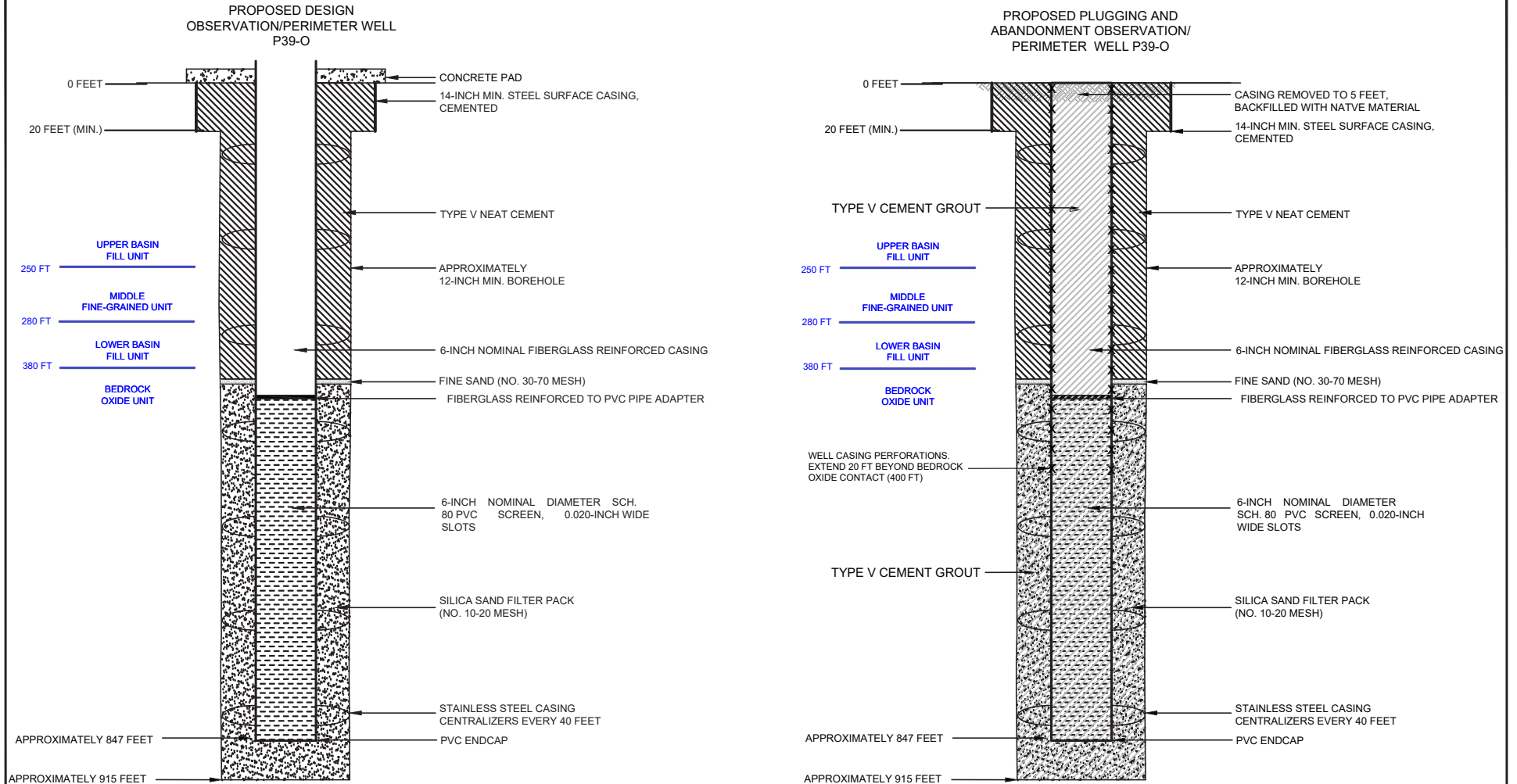
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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NOTES

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**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL P39-O

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

P49-O

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04496309

Surface Location

NW 1/4 of NW 1/4 of Section 33 Township 4S Range 9E

Longitude -111.434946

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.

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A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

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WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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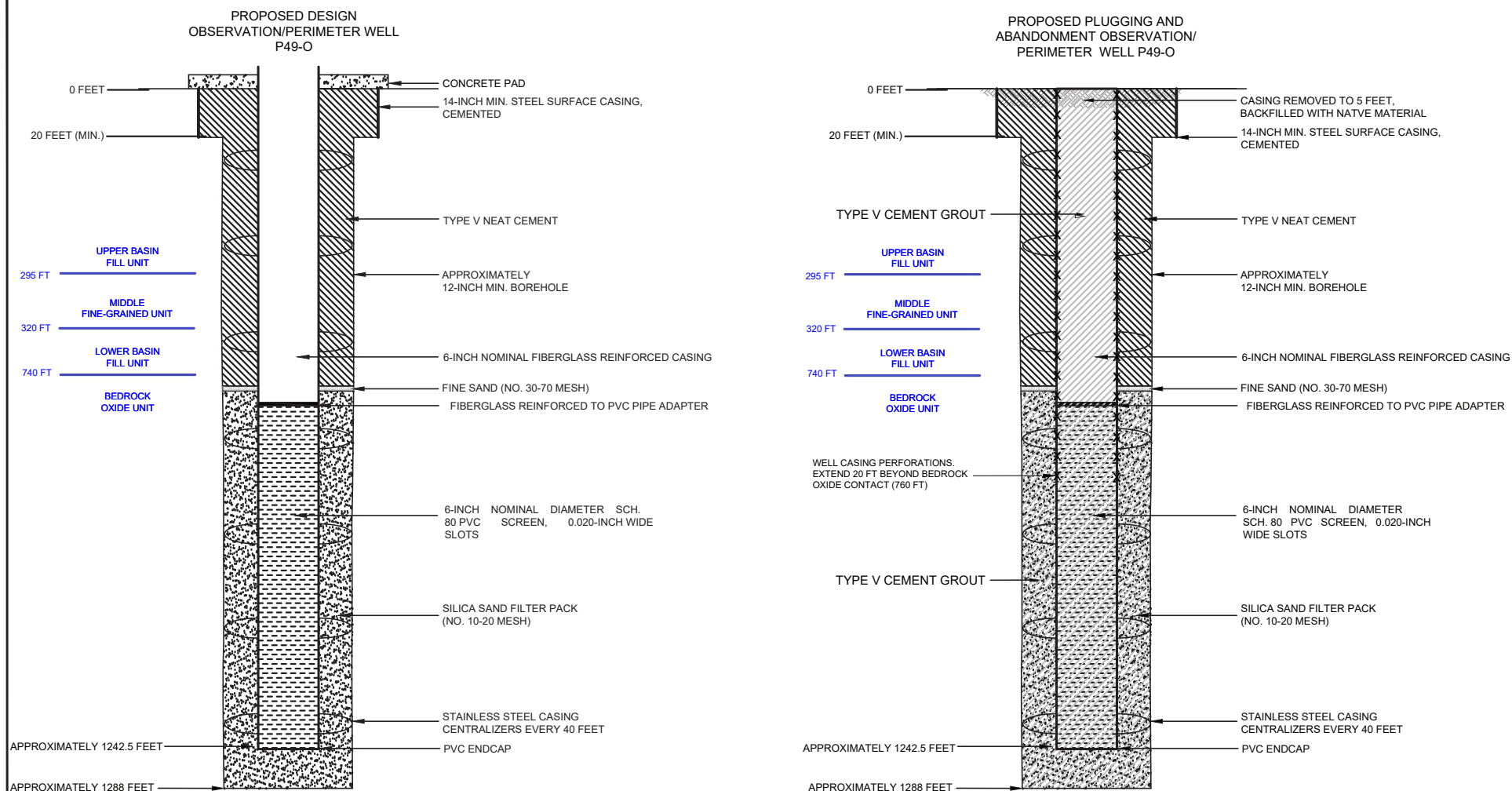
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**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC OBSERVATION/PERIMETER WELL P49-O

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

PW-1

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04995429

Surface Location

NW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4268967

 ft. from (N/S) Line of quarter section

 ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
 Date Expected to Commence March 2021
☐ Report After Work
 Date Work Ended

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Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

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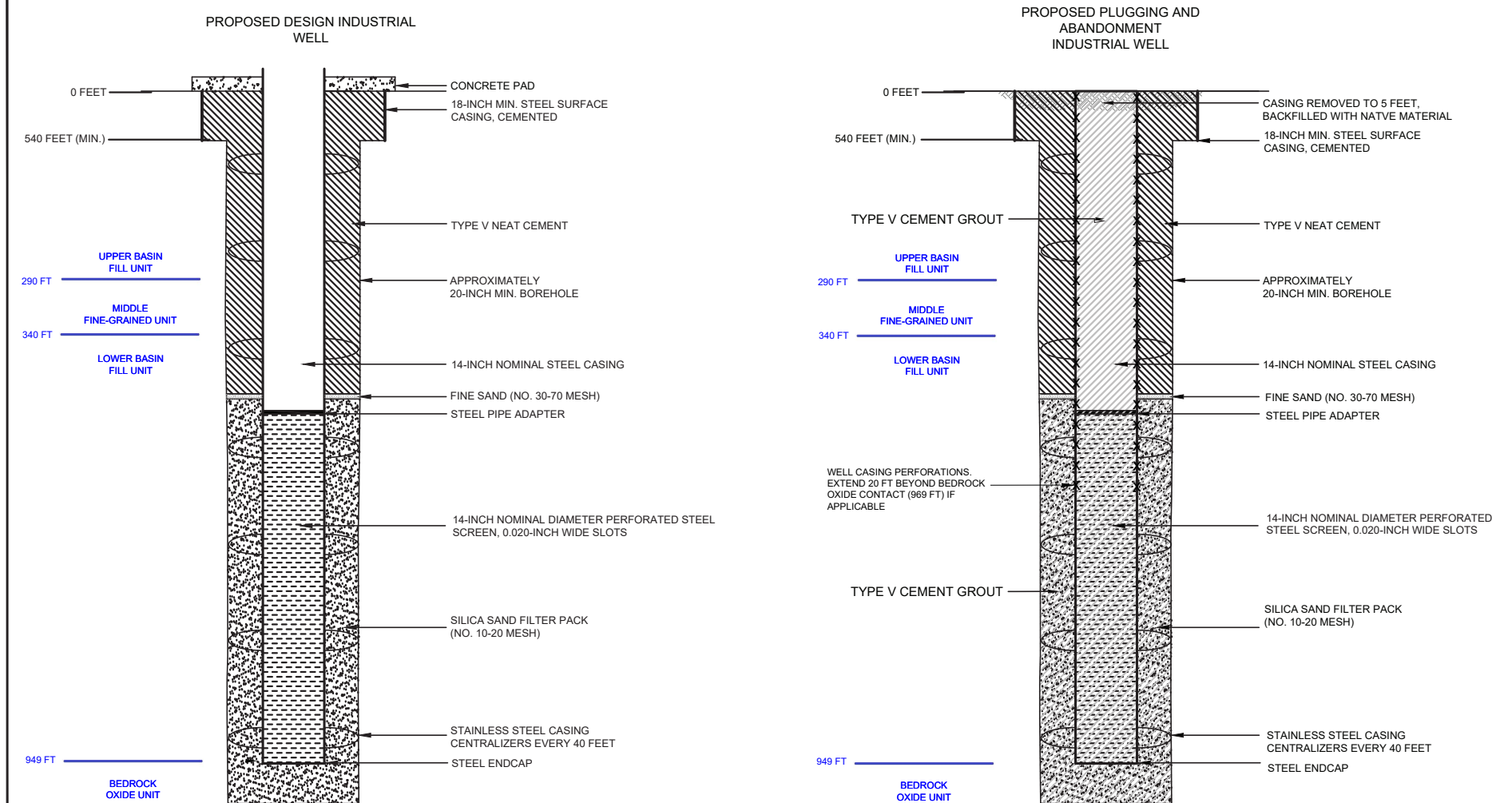
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For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC INDUSTRIAL WELL PW-1 (Conoco 1, WW-1)

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

PW1-1

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05119846

Surface Location

NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4312232

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

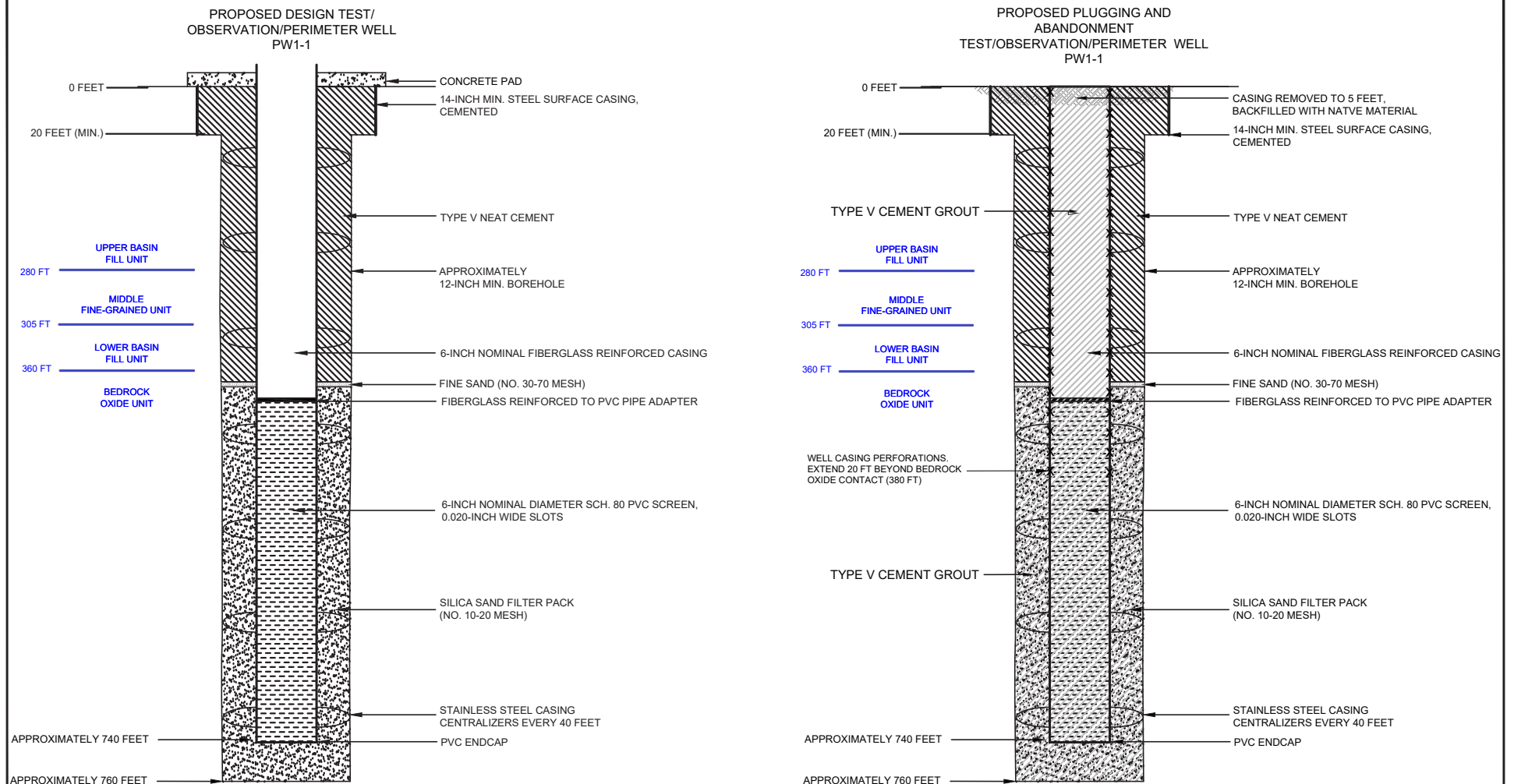
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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NOTES

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FLORENCE COPPER, INC.
 FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC TEST/OBSERVATION/PERIMETER WELL PW1-1

SEPTEMBER 2019
 SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

PW-2

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05283989

Surface Location

NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4338323

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

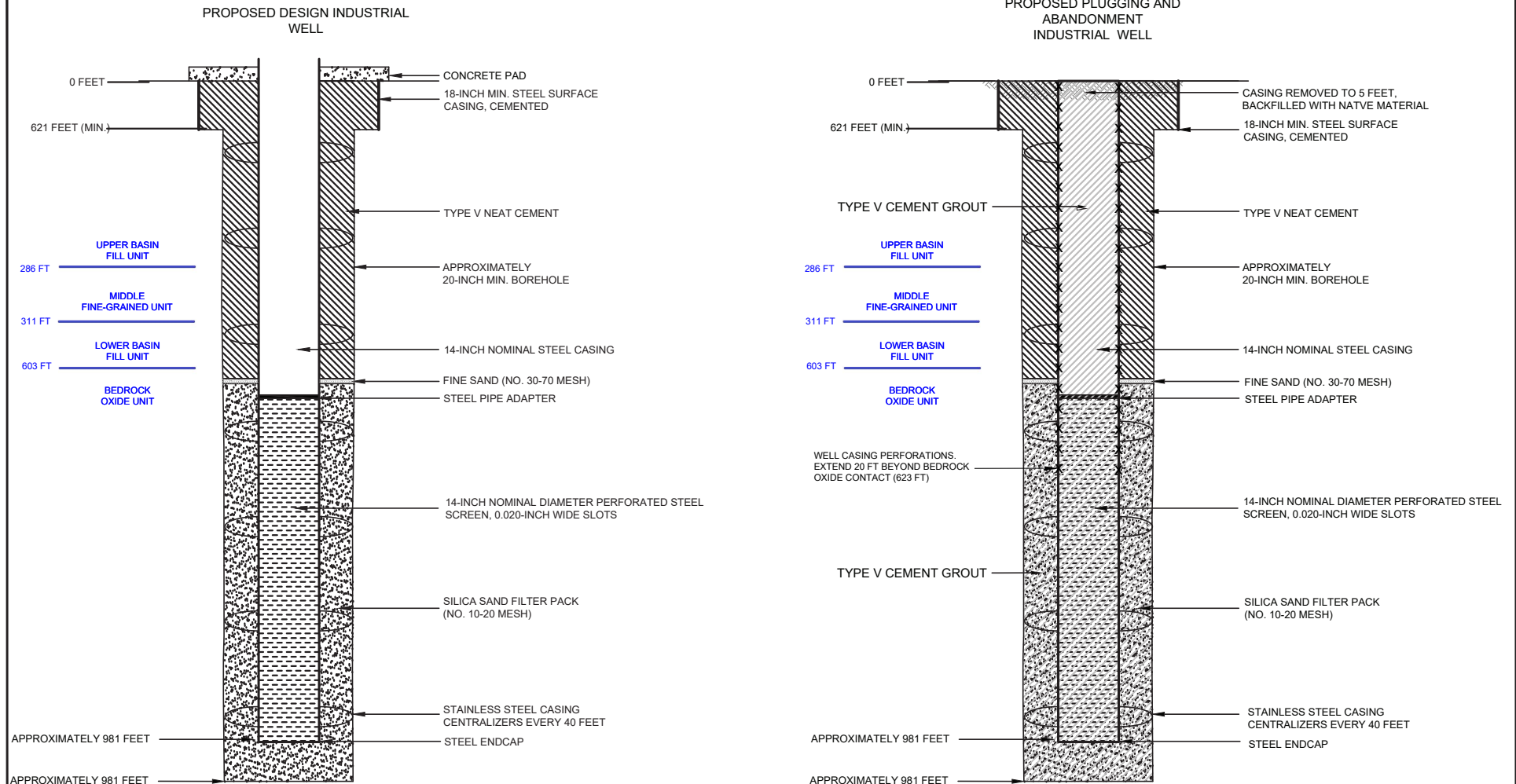
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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

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NOTES

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**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC INDUSTRIAL WELL PW-2 (Conoco 2)

SEPTEMBER 2019
SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

PW2-1

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.0504259

Surface Location

NW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4286365

 ft. from (N/S) Line of quarter section

 ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
 Date Expected to Commence March 2021
☐ Report After Work
 Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.

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Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

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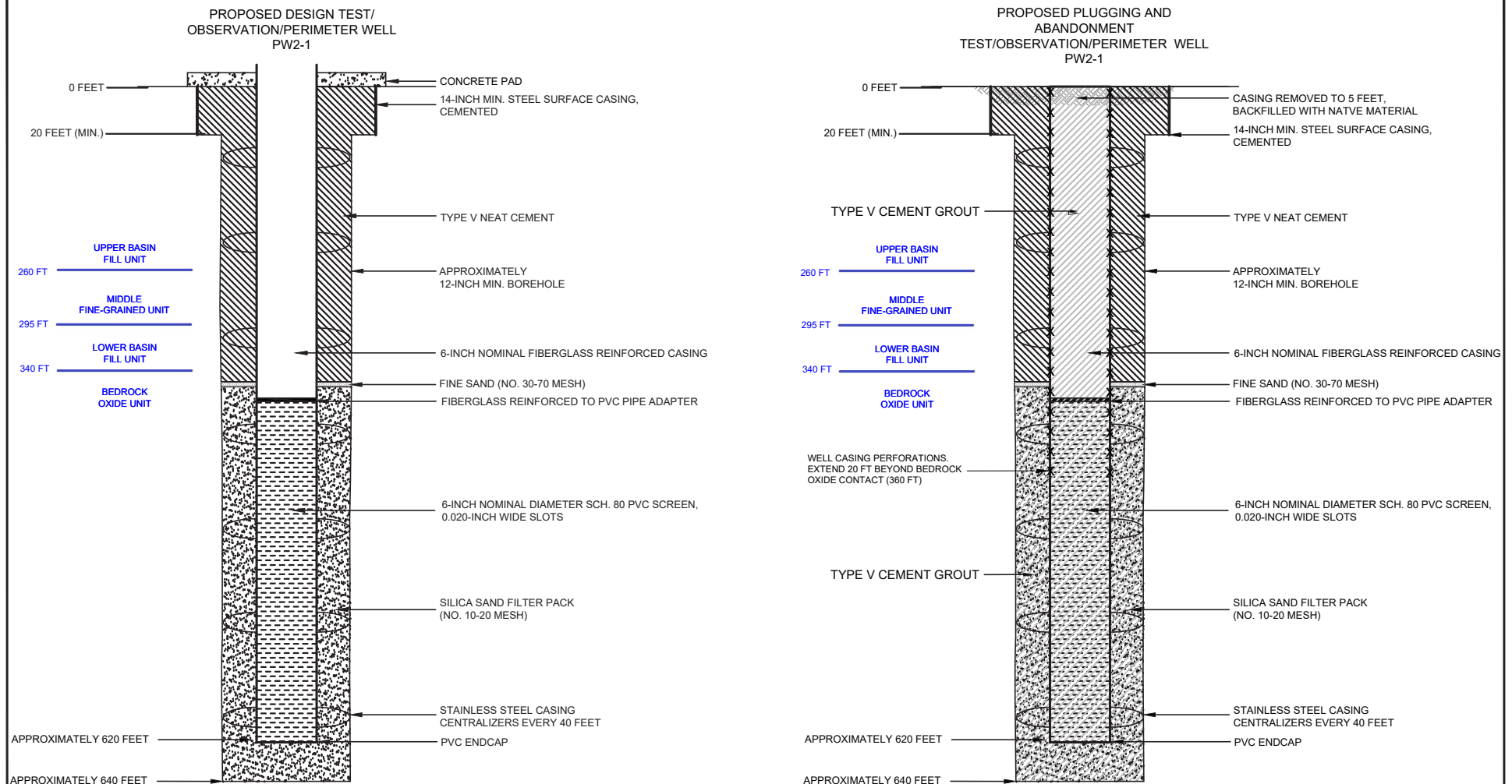
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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



NOTES

1. WELL DESIGN DETAILS ARE BASED ON CORE HOLE AND WELL LOG RECORDS.

**HALEY
ALDRICH**

FLORENCE COPPER, INC.
 FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC TEST/OBSERVATION/PERIMETER WELL PW2-1

SEPTEMBER 2019
 SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

PW2-2

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04861906

Surface Location

SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.427608

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

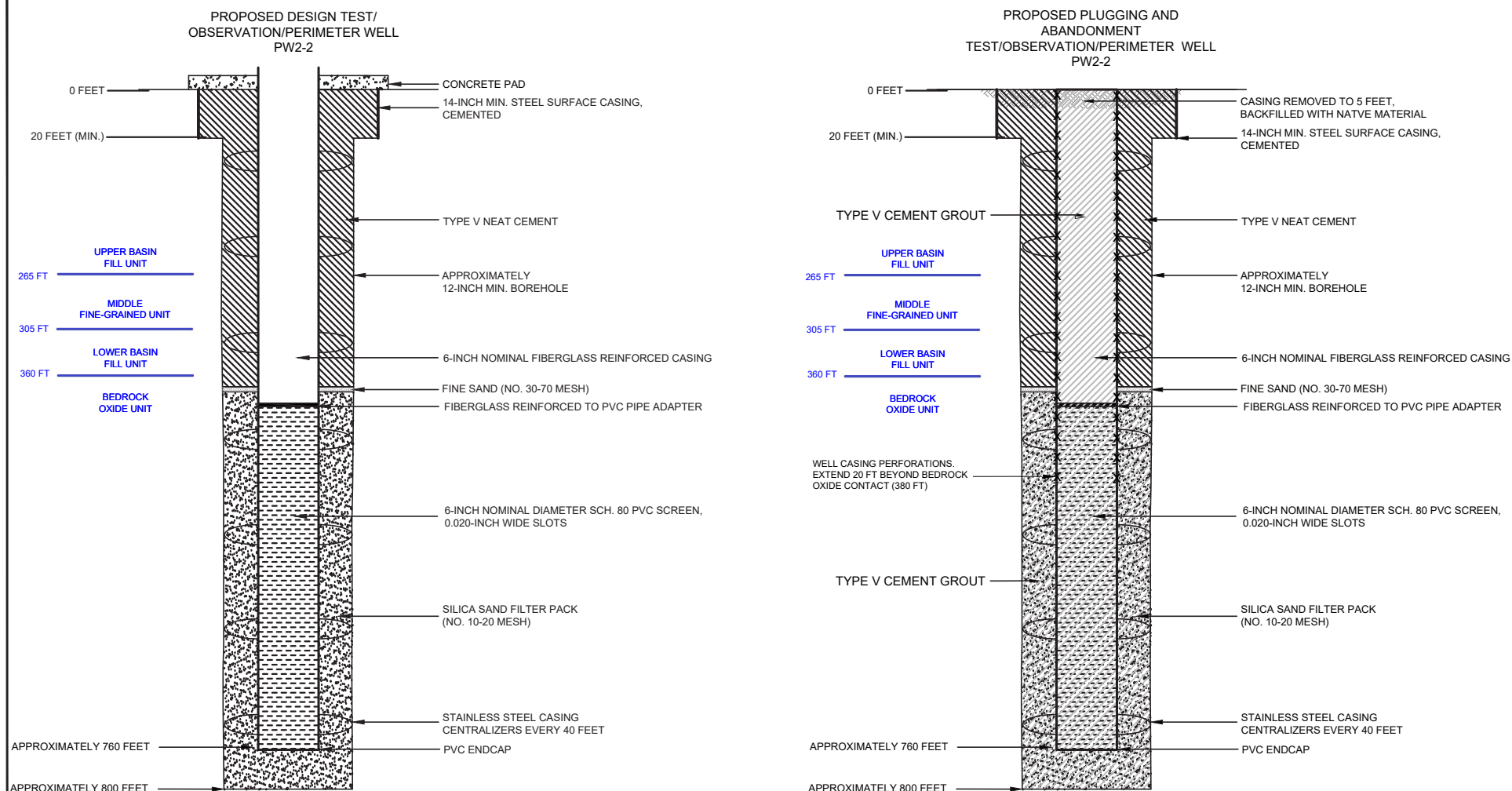
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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NOTES

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FLORENCE COPPER, INC.
 FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC TEST/OBSERVATION/PERIMETER WELL PW2-2

SEPTEMBER 2019
 SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

PW7-1

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04842523

Surface Location

SE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4309731

 ft. from (N/S) Line of quarter section

 ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
 Date Expected to Commence March 2021

- ☐ Report After Work
 Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the well. The well casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the well casing will be cleaned out to the bottom of the deepest screen or perforation to enable placement of cement seals.

If surface casing is present, an attempt will be made to remove it. If removal of the surface casing is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the surface casing cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open well from the bottom of the well casing to the top of the well casing. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated screen intervals, as necessary.

If the well casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

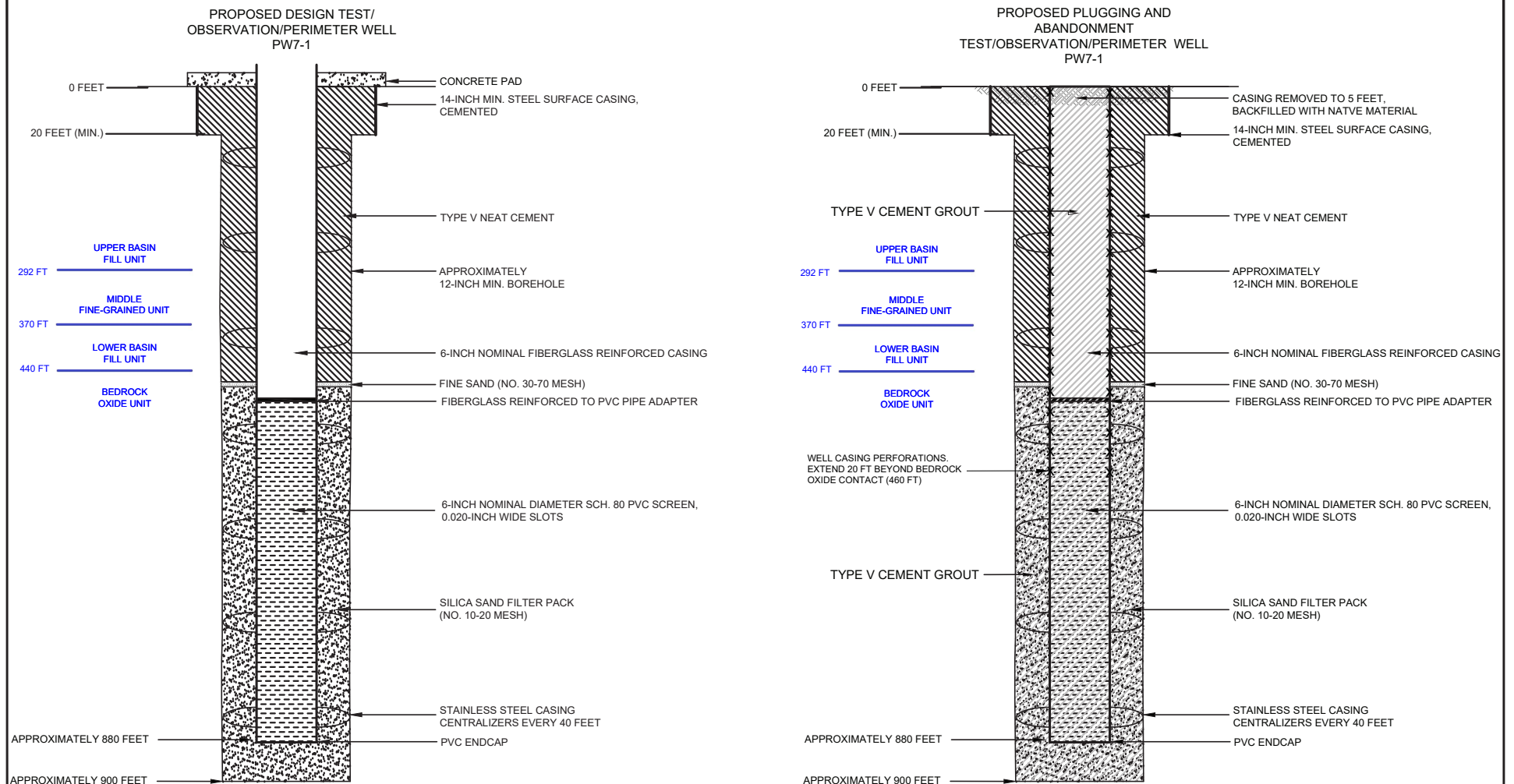
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NOTES

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**HALEY
ALDRICH**

FLORENCE COPPER, INC.
 FLORENCE, ARIZONA

ABANDONMENT SCHEMATIC TEST/OBSERVATION/PERIMETER WELL PW7-1

SEPTEMBER 2019
 SCALE: AS SHOWN

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Shaft No.1

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05091148

Surface Location

NW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4292428

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the shaft. The casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the casing will be cleaned out to the bottom to enable placement of cement seals. In areas of agricultural use, the casing will be cut at least 5 feet bgs and removed.

A tremie pipe will be used to place Type V cement in the shaft from the bottom of the well casing to the top of the casing.

If the casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

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For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

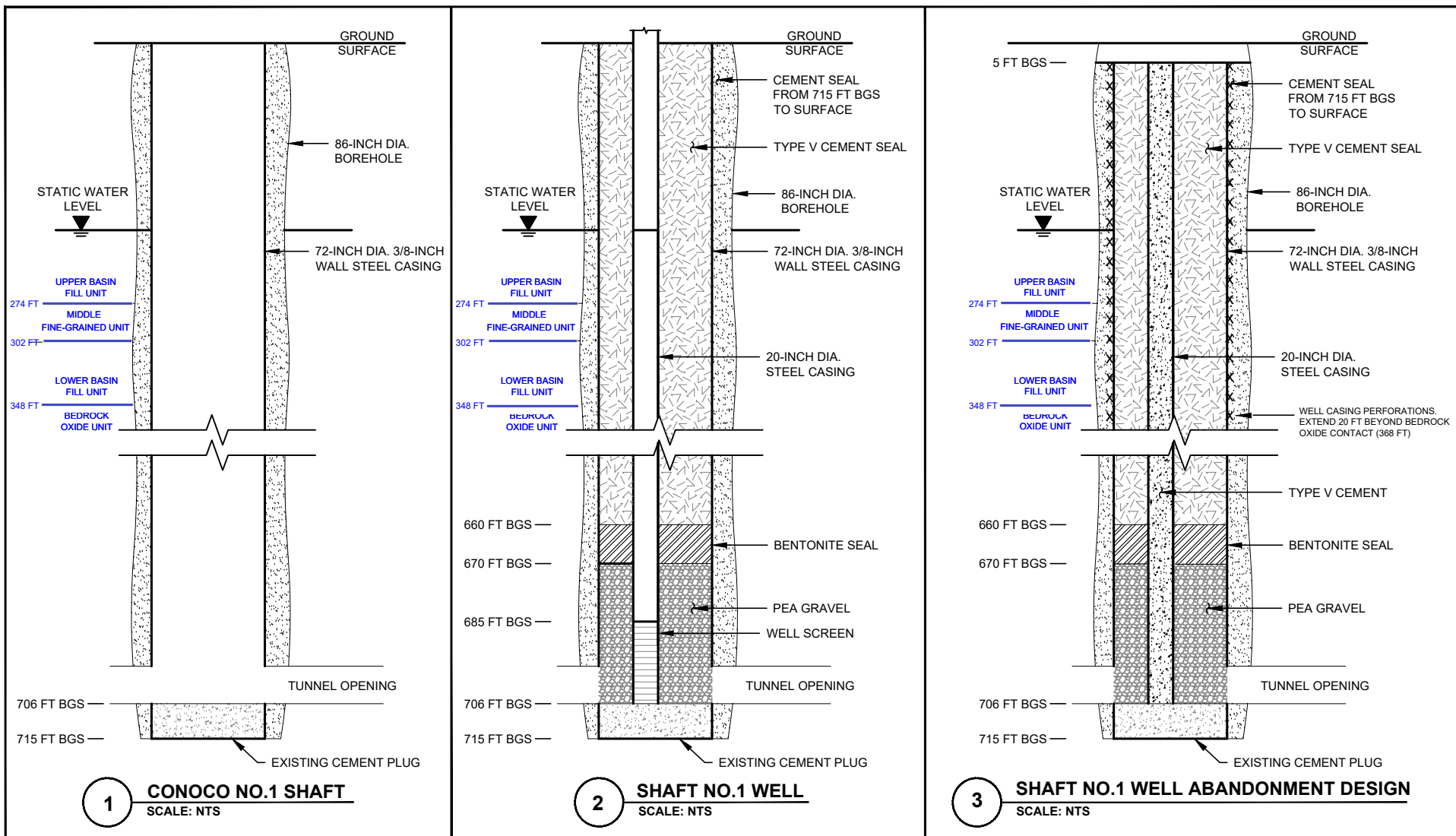
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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

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**HALEY
ALDRICH**

FLORENCE COPPER
UIC PERMIT APPLICATION

CONOCO SHAFT NO.1 RECOVERY WELL AND ABANDONMENT DETAIL

SCALE: AS SHOWN
OCTOBER 2019

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

Airshaft

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05114647

Surface Location

NW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4292405

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the shaft. The casing will be inspected to determine the depth to which the well remains open and if any obstructions are present in the casing; the presence and condition of any existing surface casing will also be documented. If necessary, the casing will be cleaned out to the bottom to enable placement of cement seals. In areas of agricultural use, the casing will be cut at least 5 feet bgs and removed.

A tremie pipe will be used to place Type V cement in the shaft from the bottom of the well casing to the top of the casing.

If the casing has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the casing.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

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API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

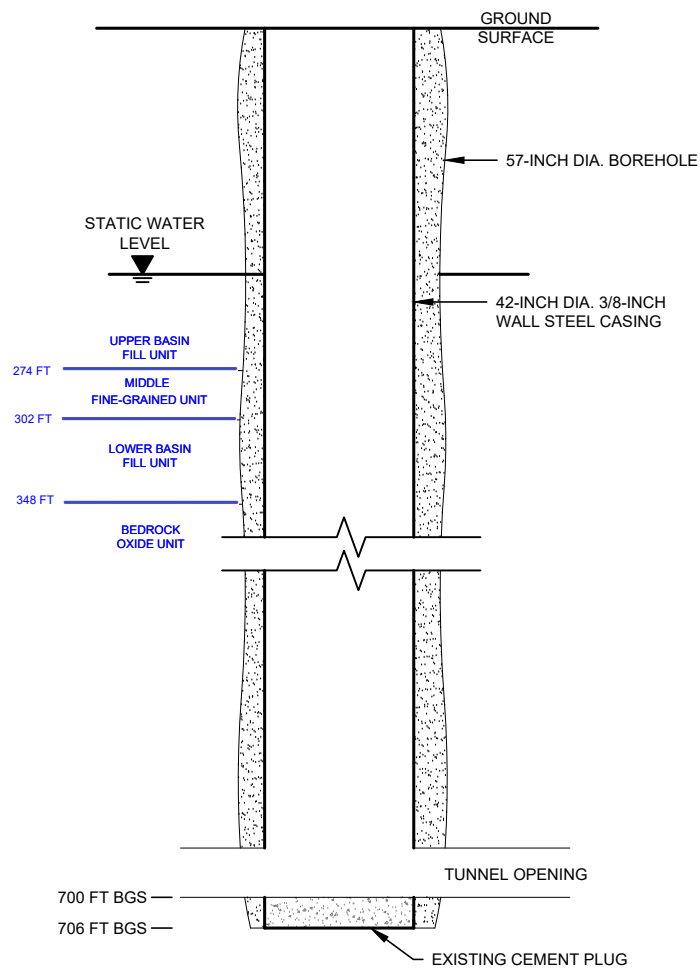
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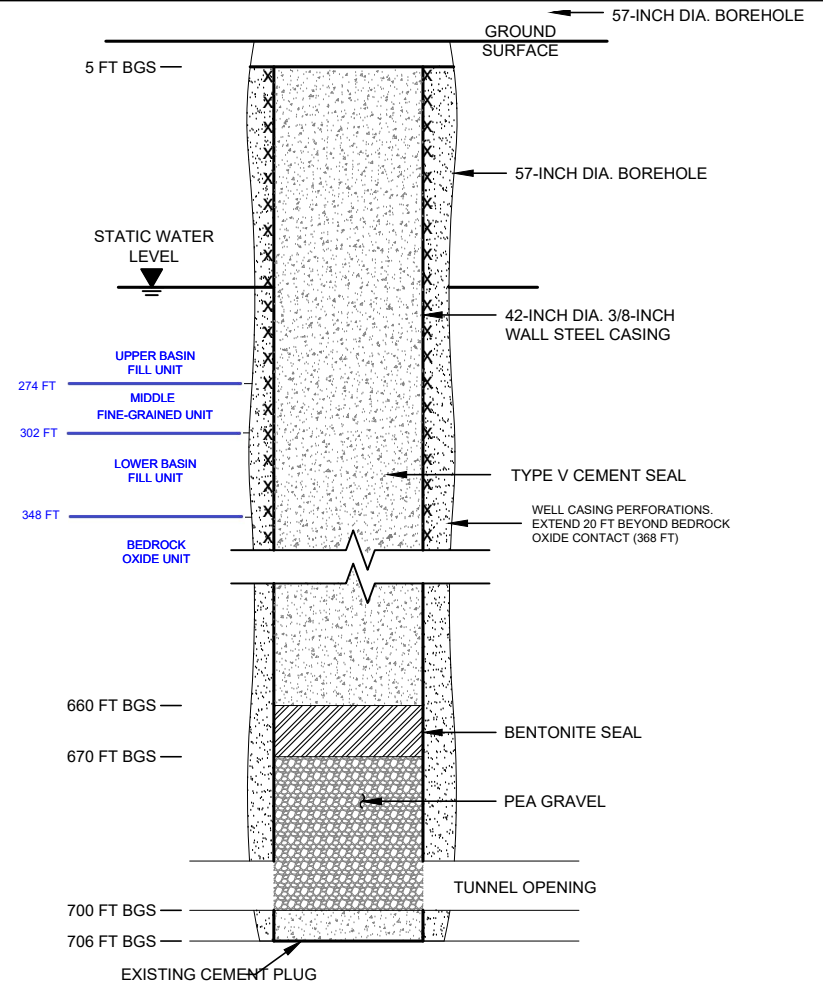
For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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1 CONOCO NO.2 SHAFT
SCALE: NTS



2 CONOCO NO.2 SHAFT ABANDONMENT DETAIL
SCALE: NTS

HALEY ALDRICH FLORENCE COPPER
UIC PERMIT APPLICATION

**AIRSHAFT (CONOCO NO.2 SHAFT)
ABANDONMENT DETAIL**

SCALE: AS SHOWN
OCTOBER 2019

FIGURE 1

EXHIBIT E-3

**Plugging and Abandonment Forms
for Core Holes within AOR**

United States Environmental Protection Agency



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R9UIC-AZ3-FY11-1

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Full Well Name

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County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05494382

Surface Location

SE 1/4 of NW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4338705

ft. from (N/S) Line of quarter section

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Well Class

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A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open core hole from the bottom of the core hole to the top of the core hole. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated intervals, as necessary.

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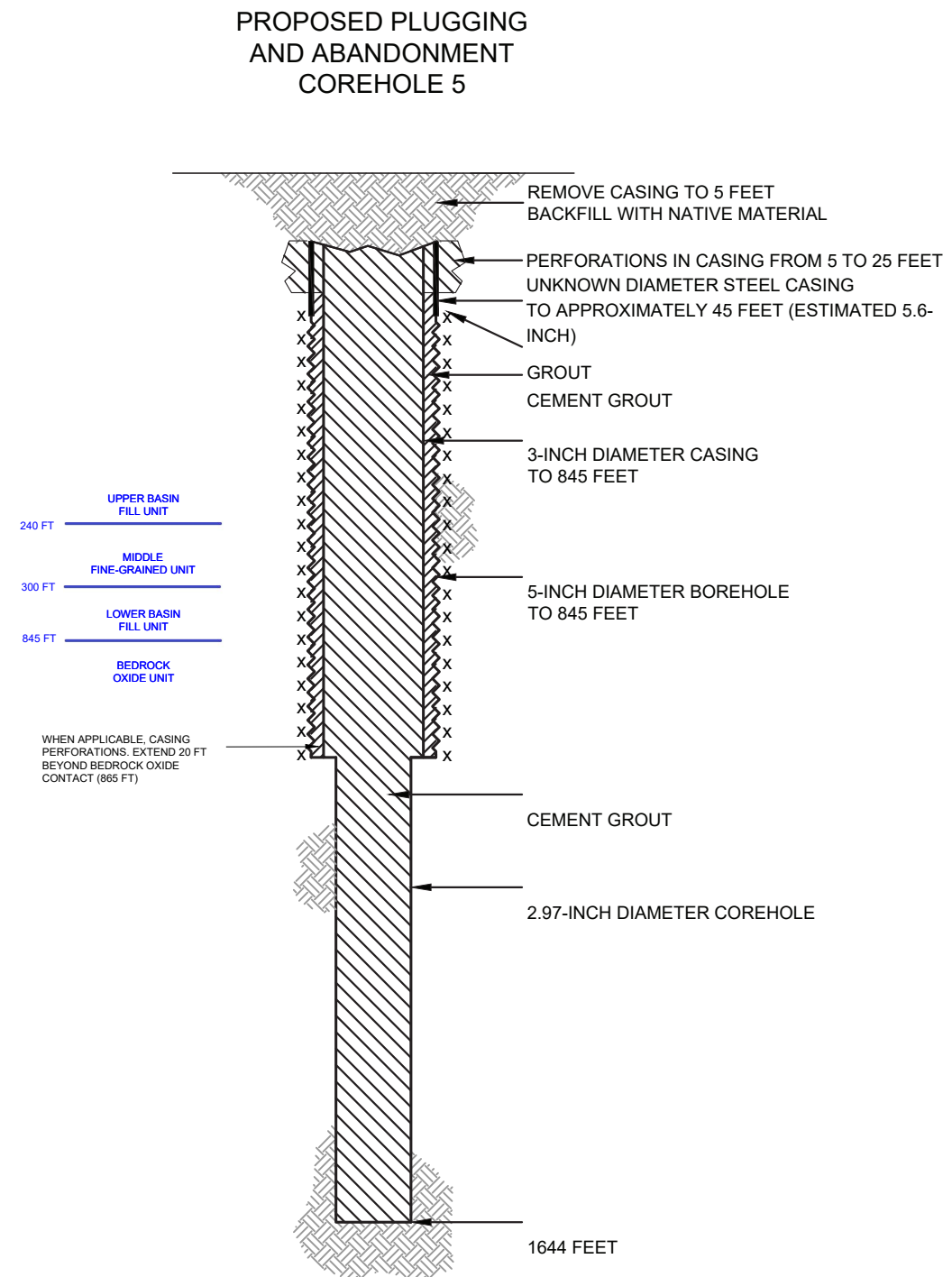
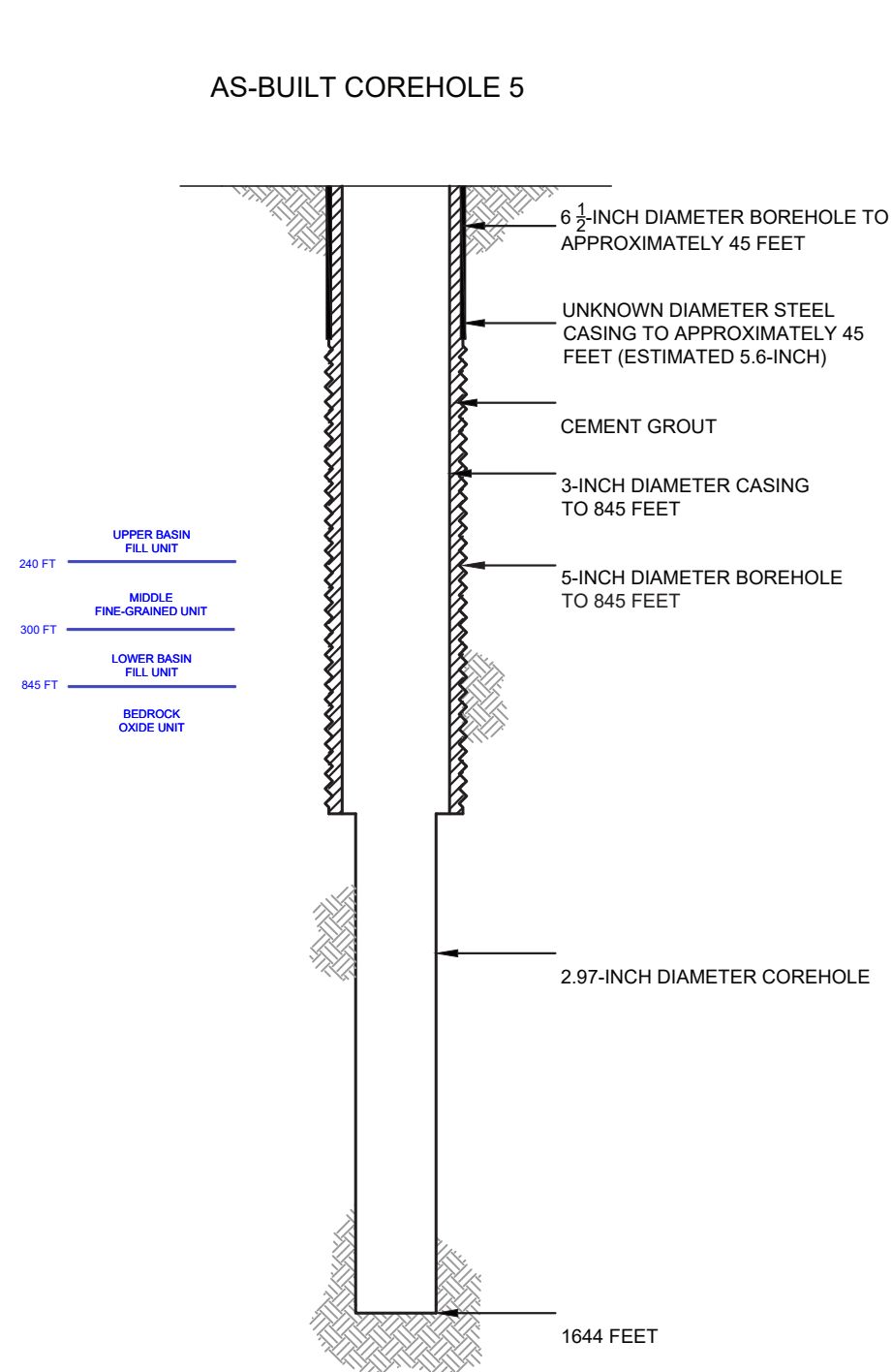
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6S

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County

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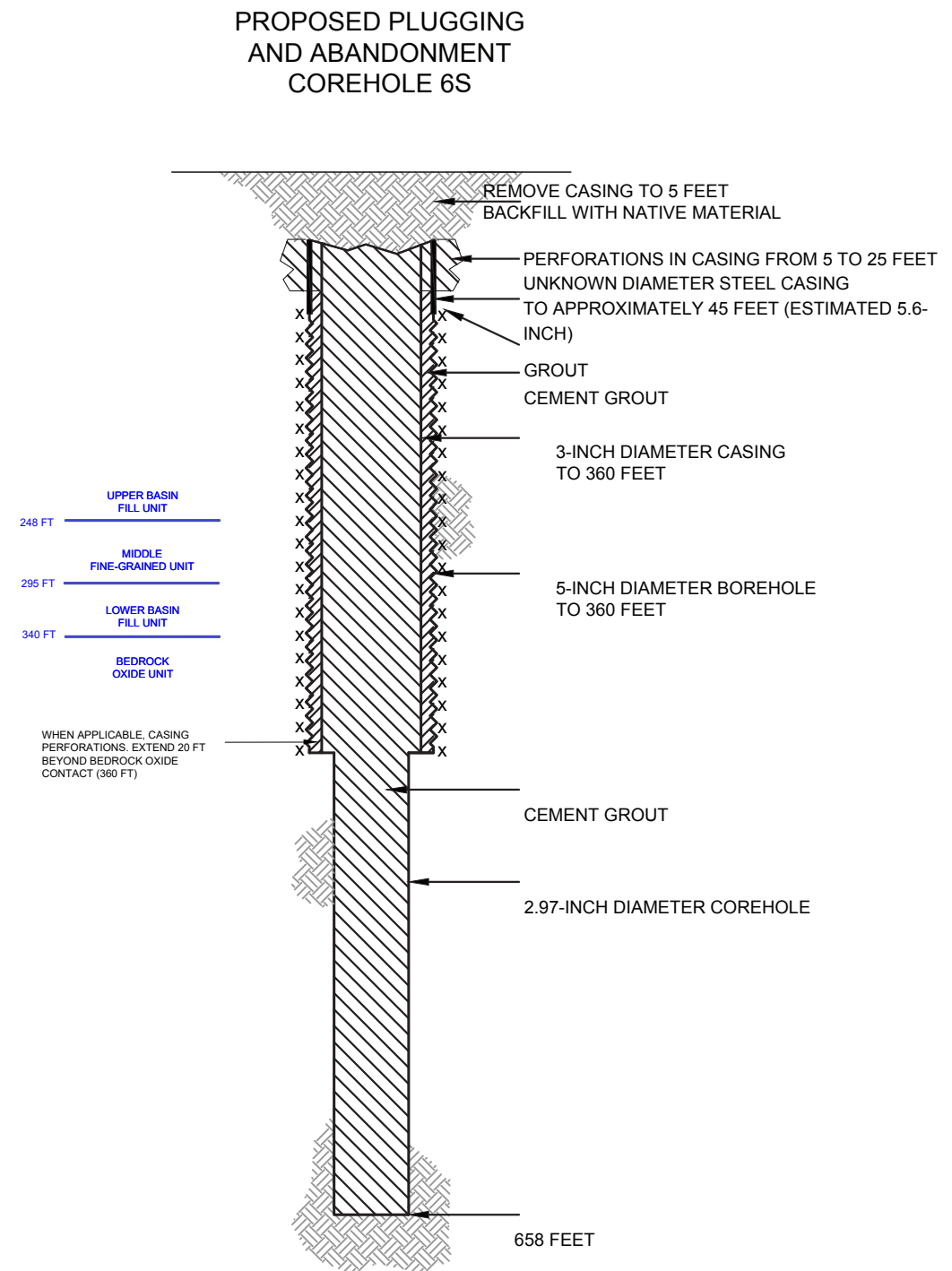
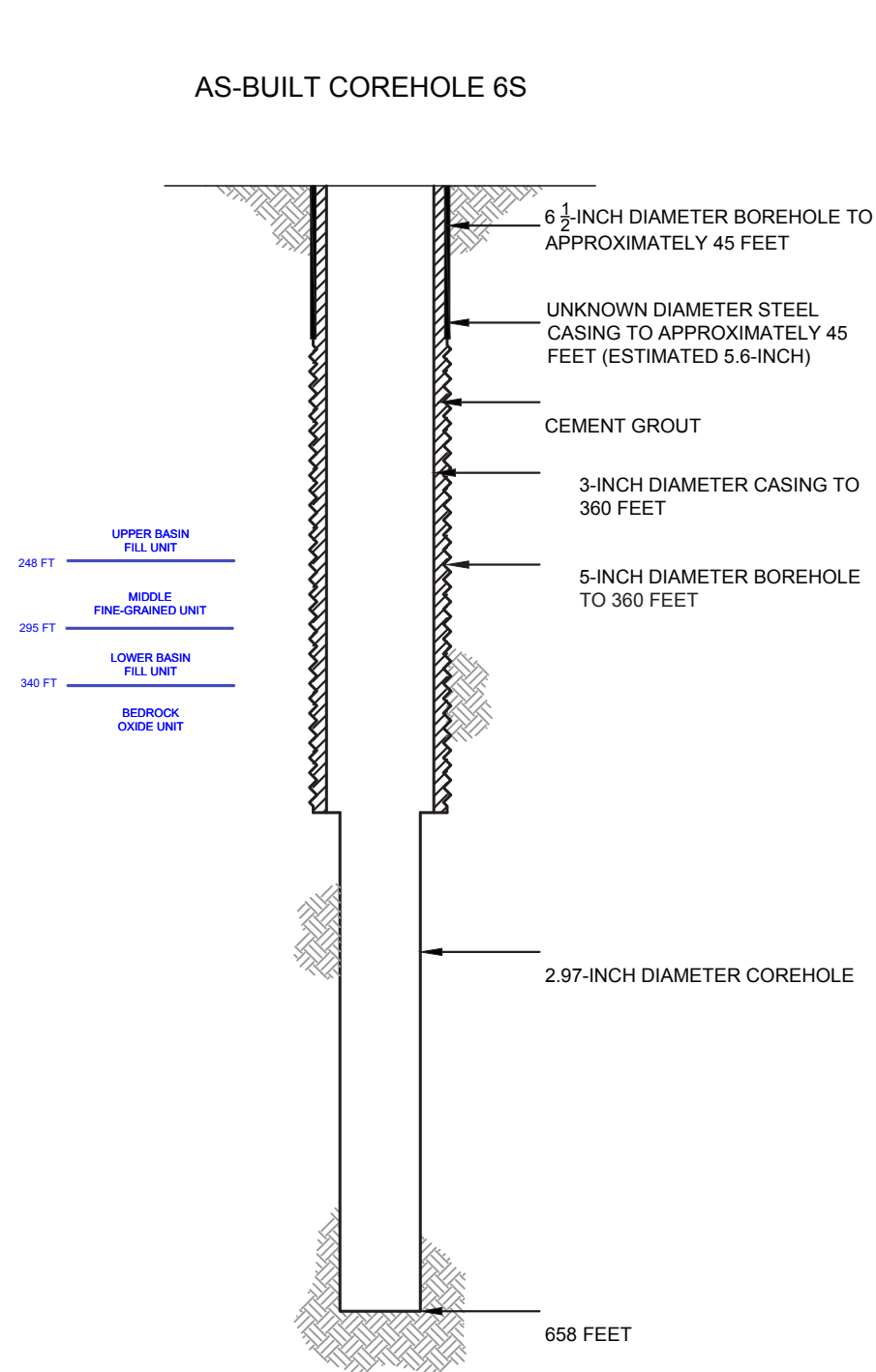
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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 6S DIAGRAM



NOT TO SCALE
SEPTEMBER 2019

United States Environmental Protection Agency



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A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

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If the hole has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the core hole.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

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For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

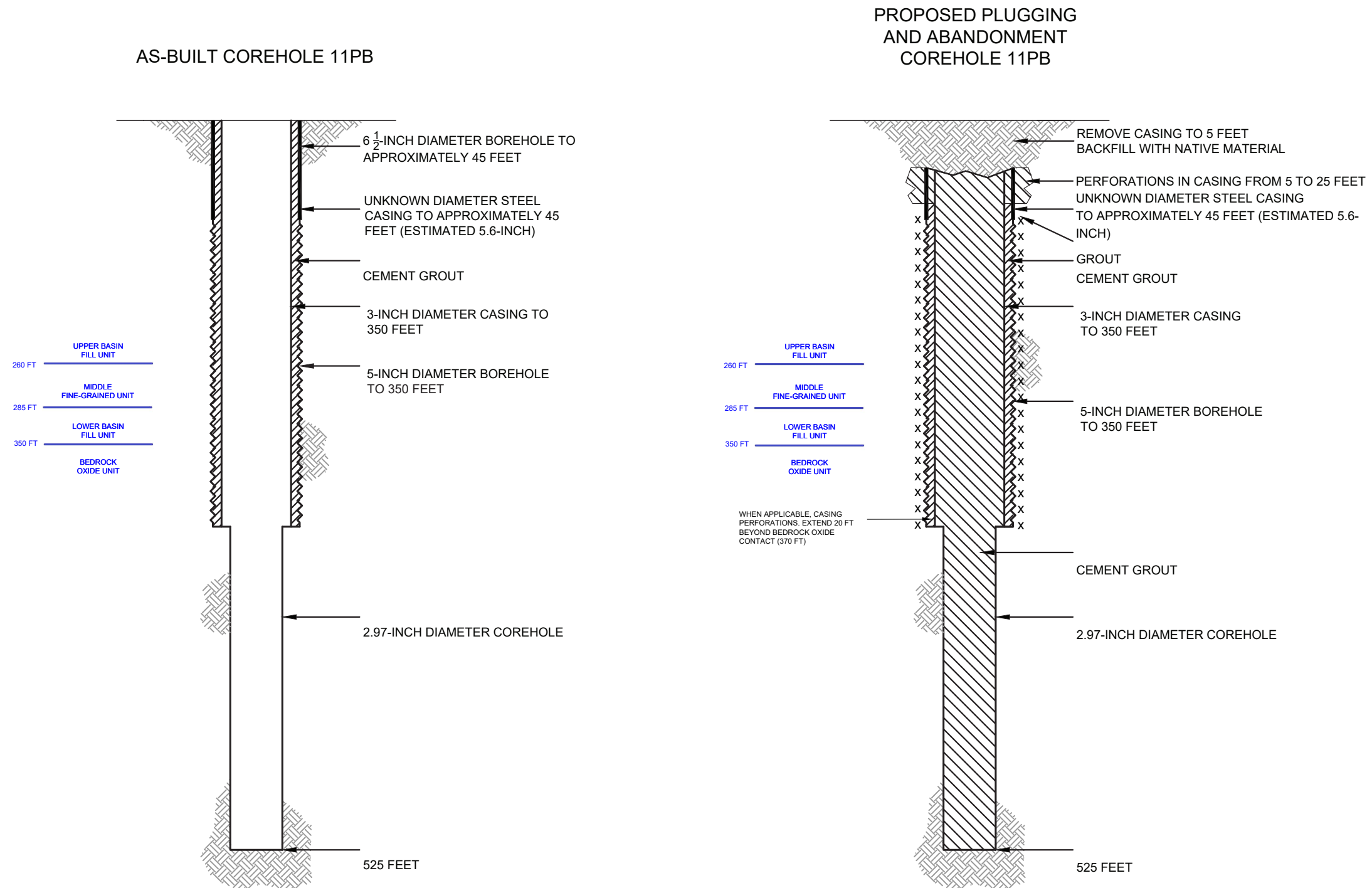
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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

18S

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04975397

Surface Location

NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4305647

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

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A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

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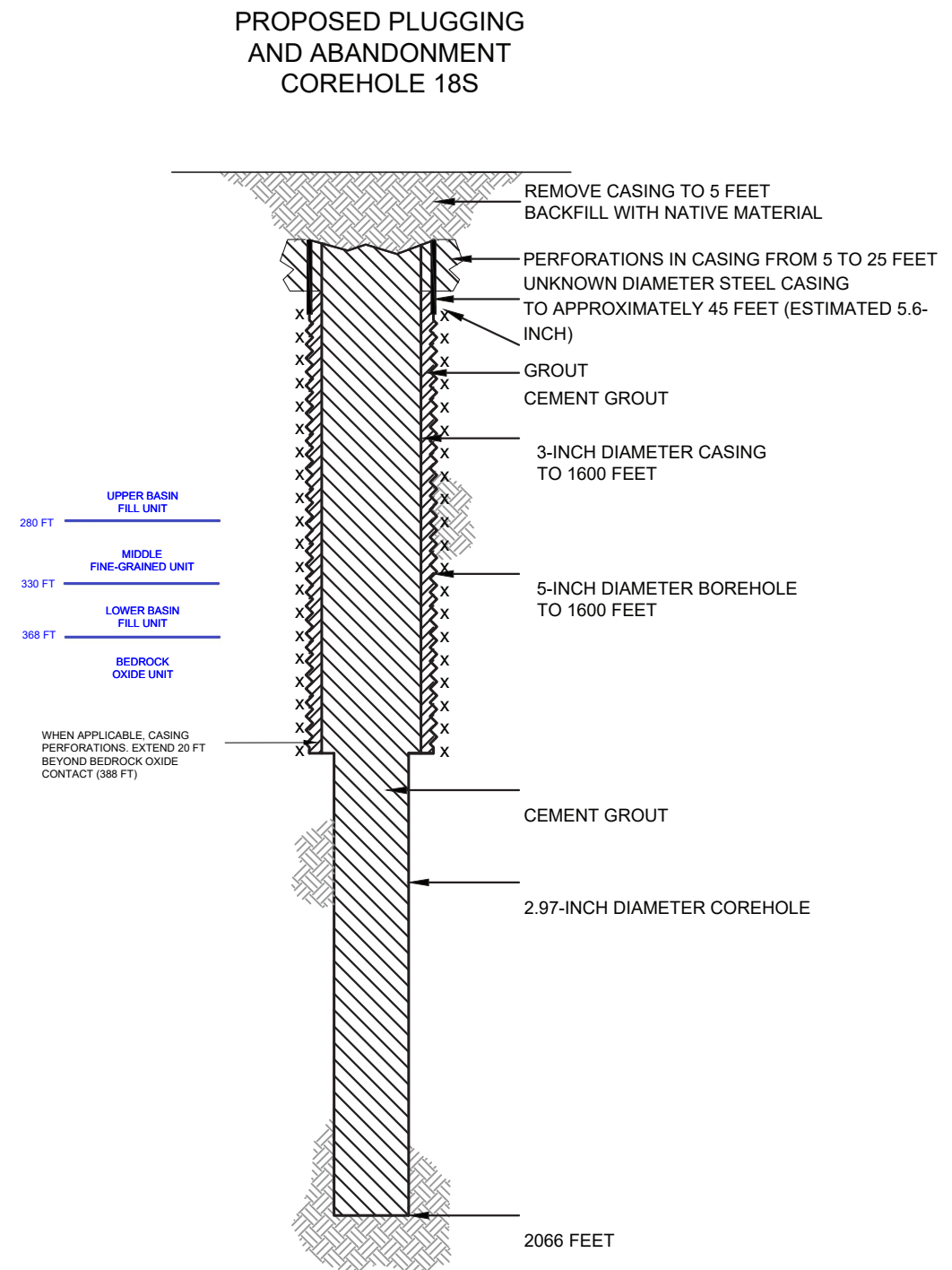
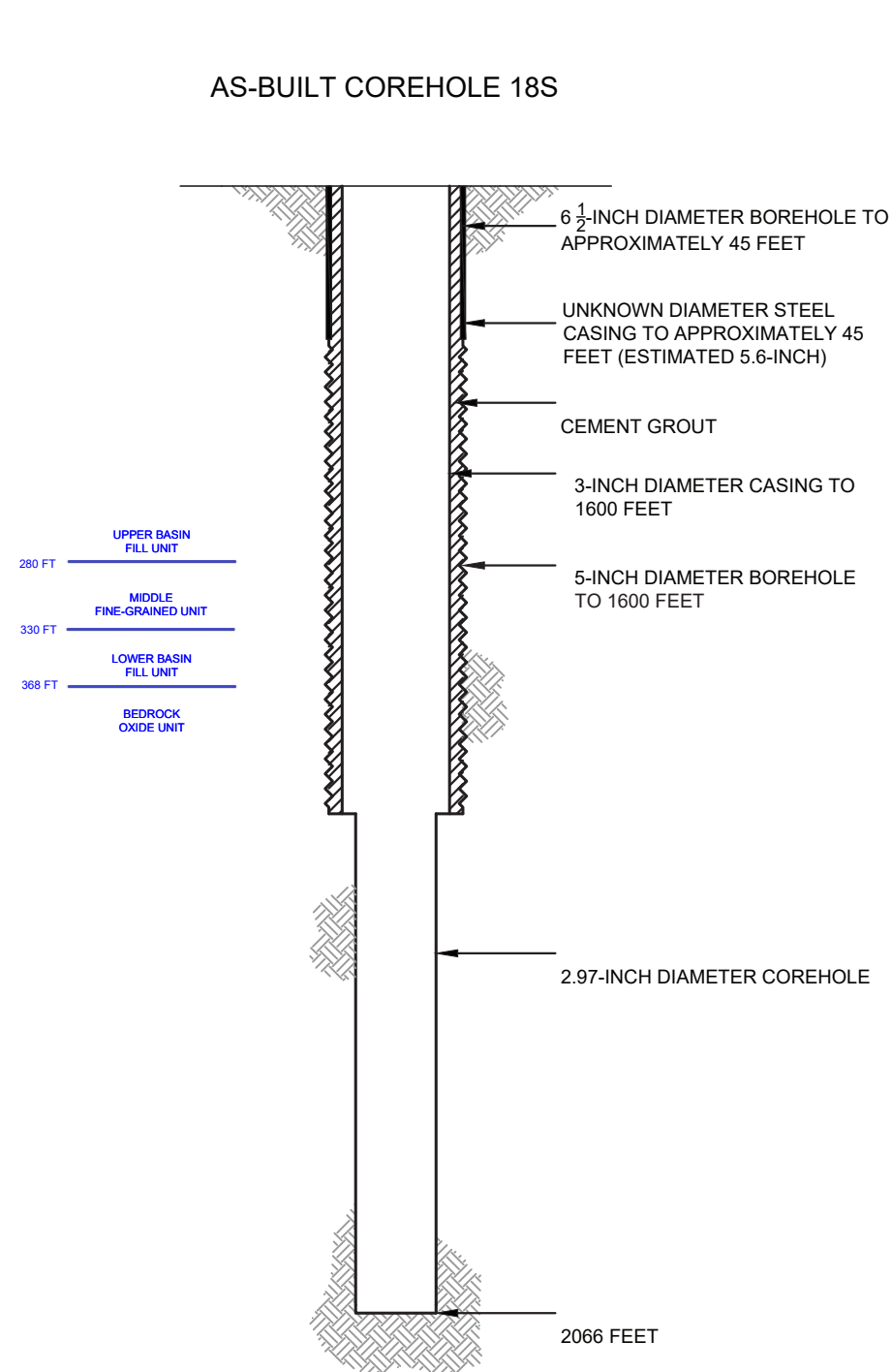
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United States Environmental Protection Agency



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Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

32MF

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.0455677

Surface Location

NE 1/4 of NW 1/4 of Section 33 Township 4S Range 9E

Longitude -111.430389

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021
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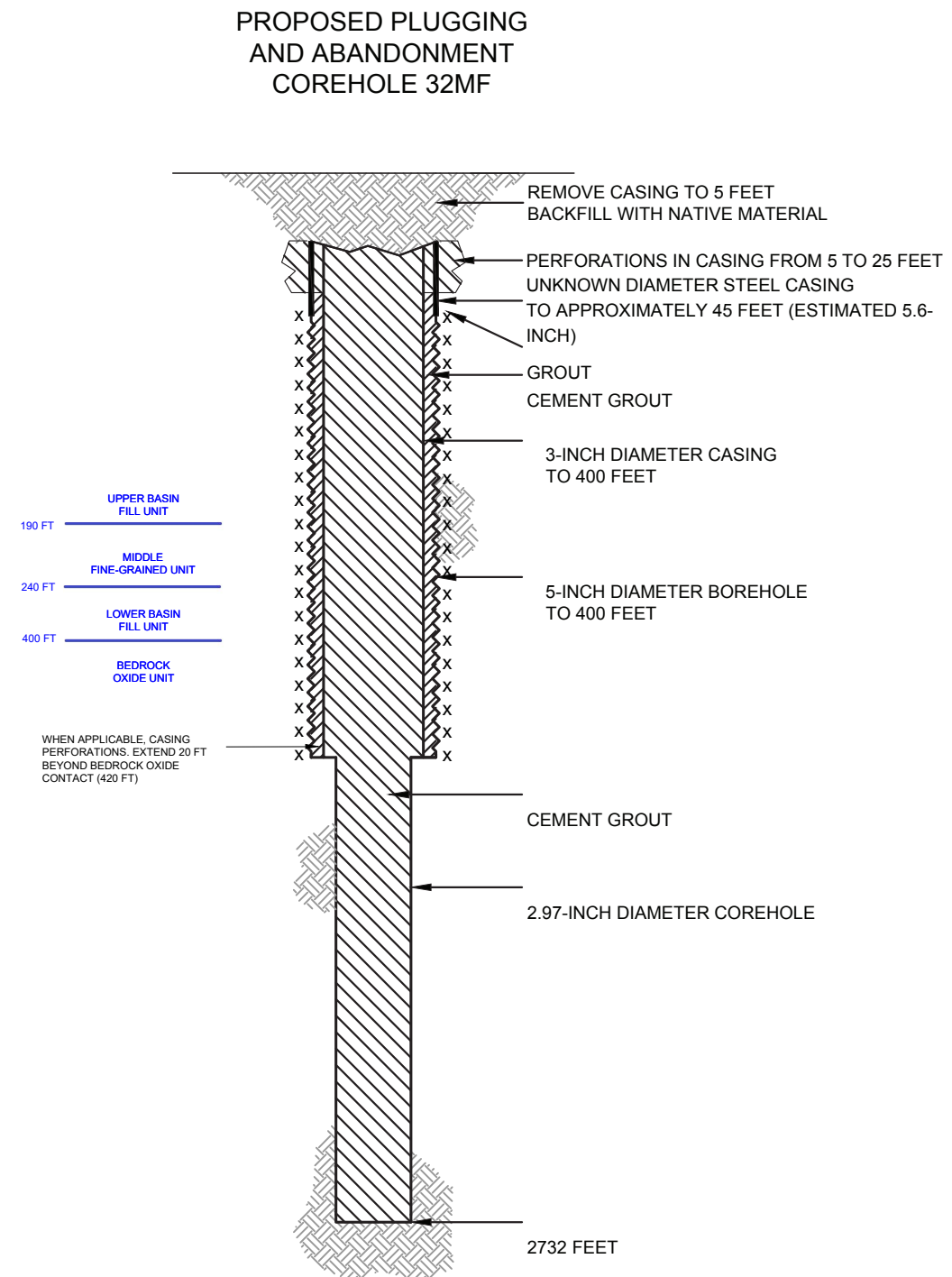
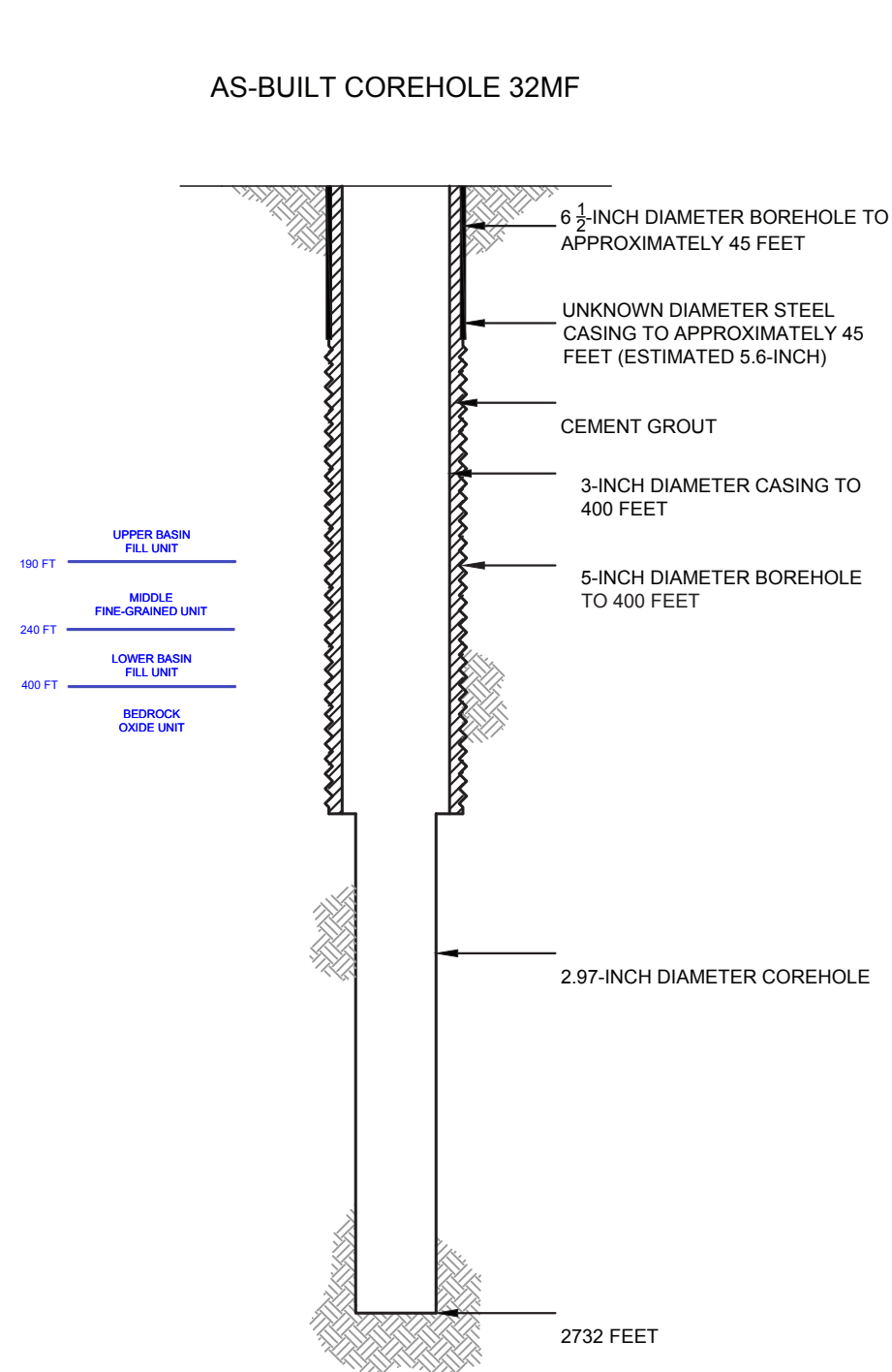
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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 32MF DIAGRAM



NOT TO SCALE
SEPTEMBER 2019

United States Environmental Protection Agency



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Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
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Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

33S

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05068214

Surface Location

NW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4266913

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

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Timing of Action (pick one)

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Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

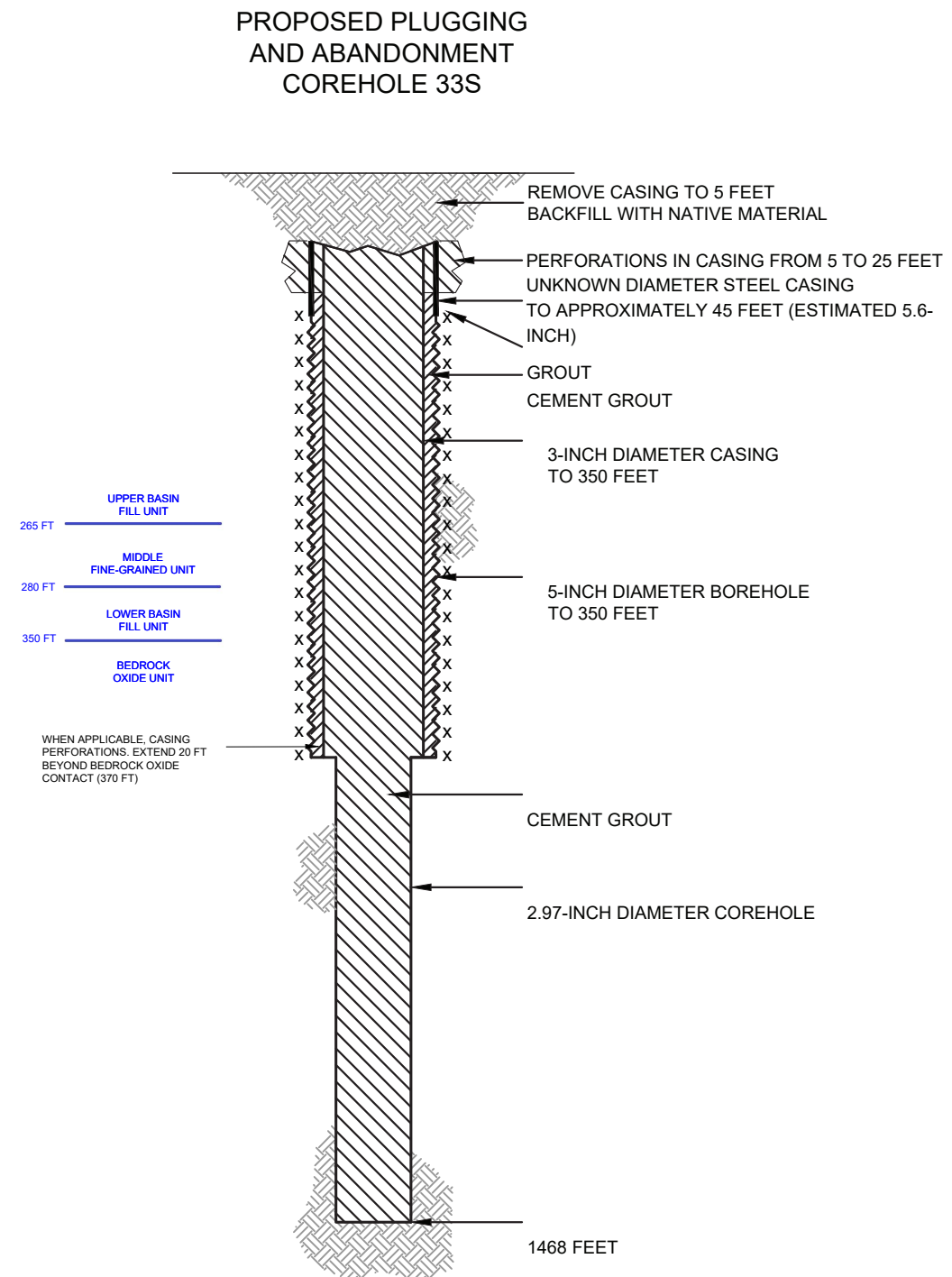
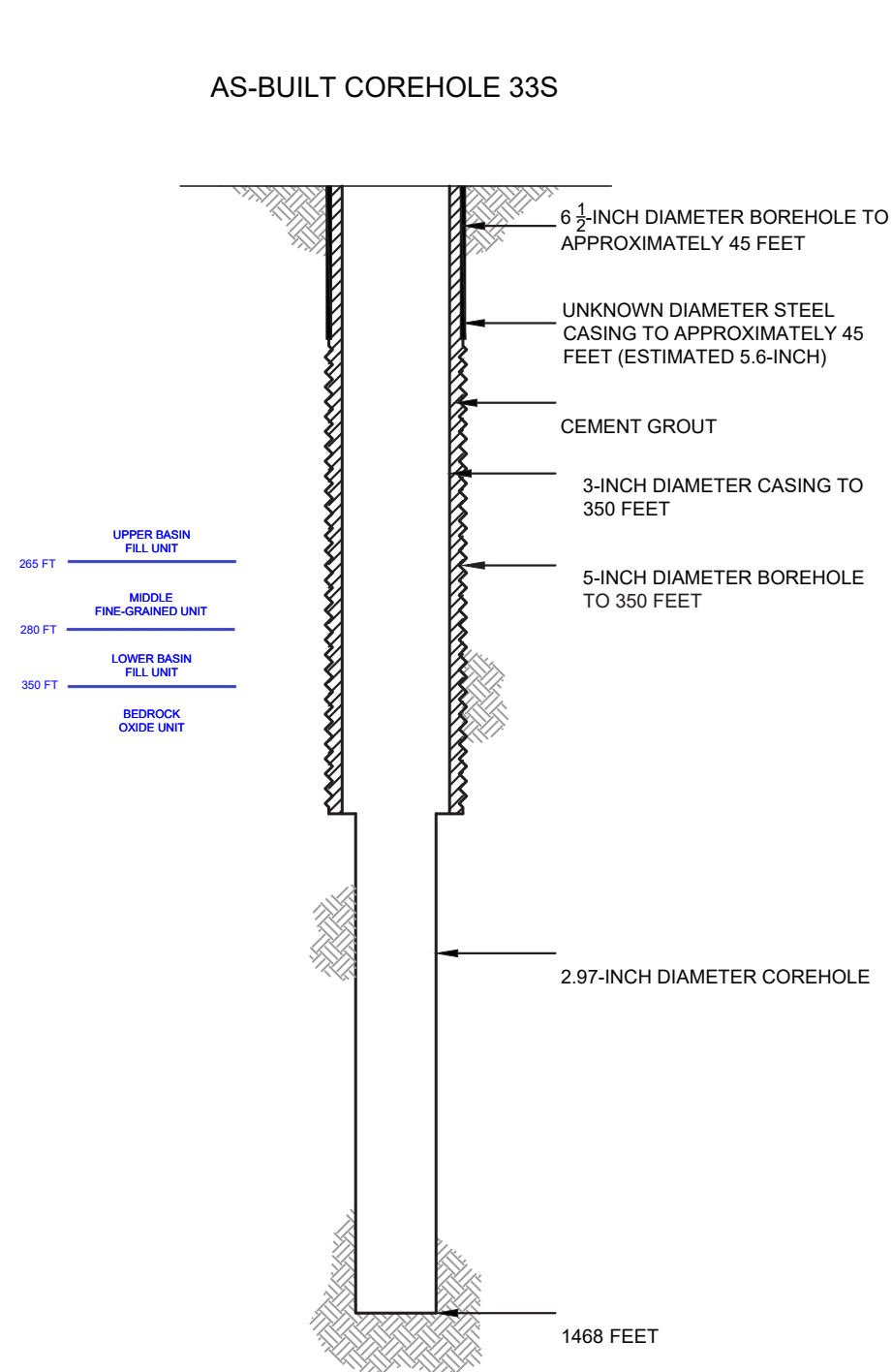
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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 33S DIAGRAM



NOT TO SCALE
SEPTEMBER 2019

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

45S

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05217691

Surface Location

NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4302923

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open core hole from the bottom of the core hole to the top of the core hole. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated intervals, as necessary.

If the hole has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the core hole.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

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API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

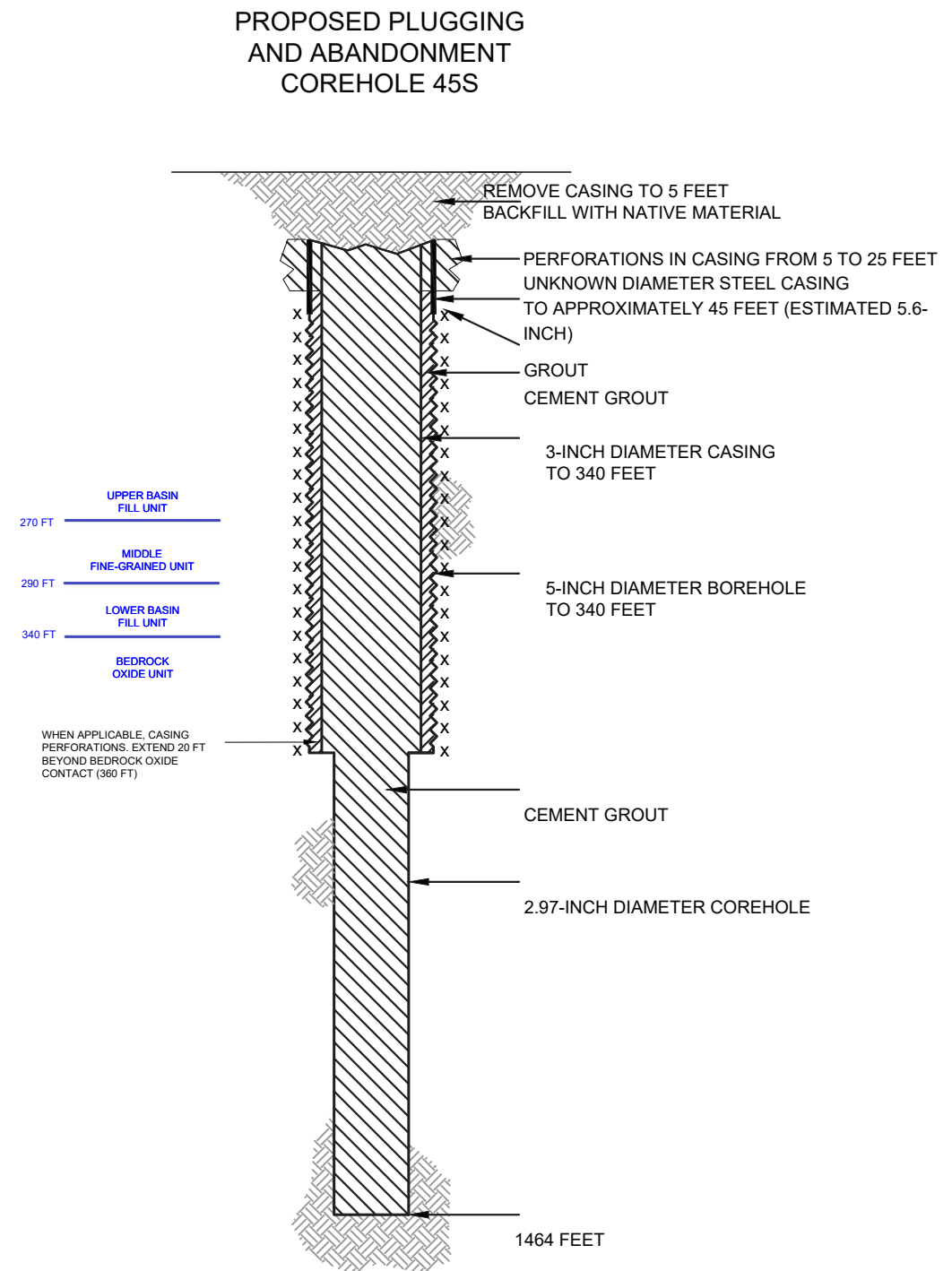
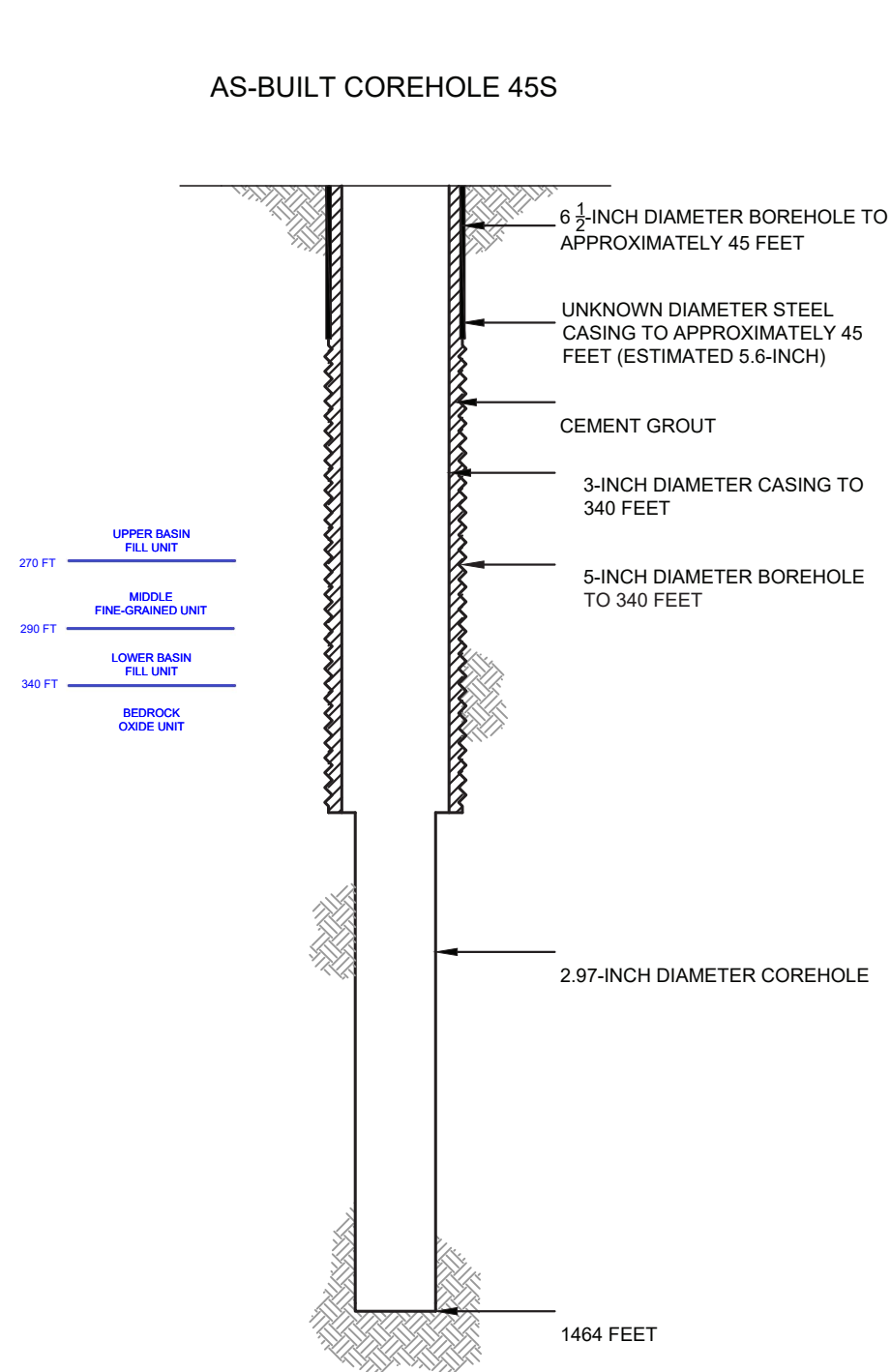
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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 45S DIAGRAM



NOT TO SCALE
SEPTEMBER 2019

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

46

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05340871

Surface Location

SW 1/4 of NE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4281494

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

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A tremie pipe will be used to place Type V cement in the open core hole from the bottom of the core hole to the top of the core hole. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated intervals, as necessary.

If the hole has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the core hole.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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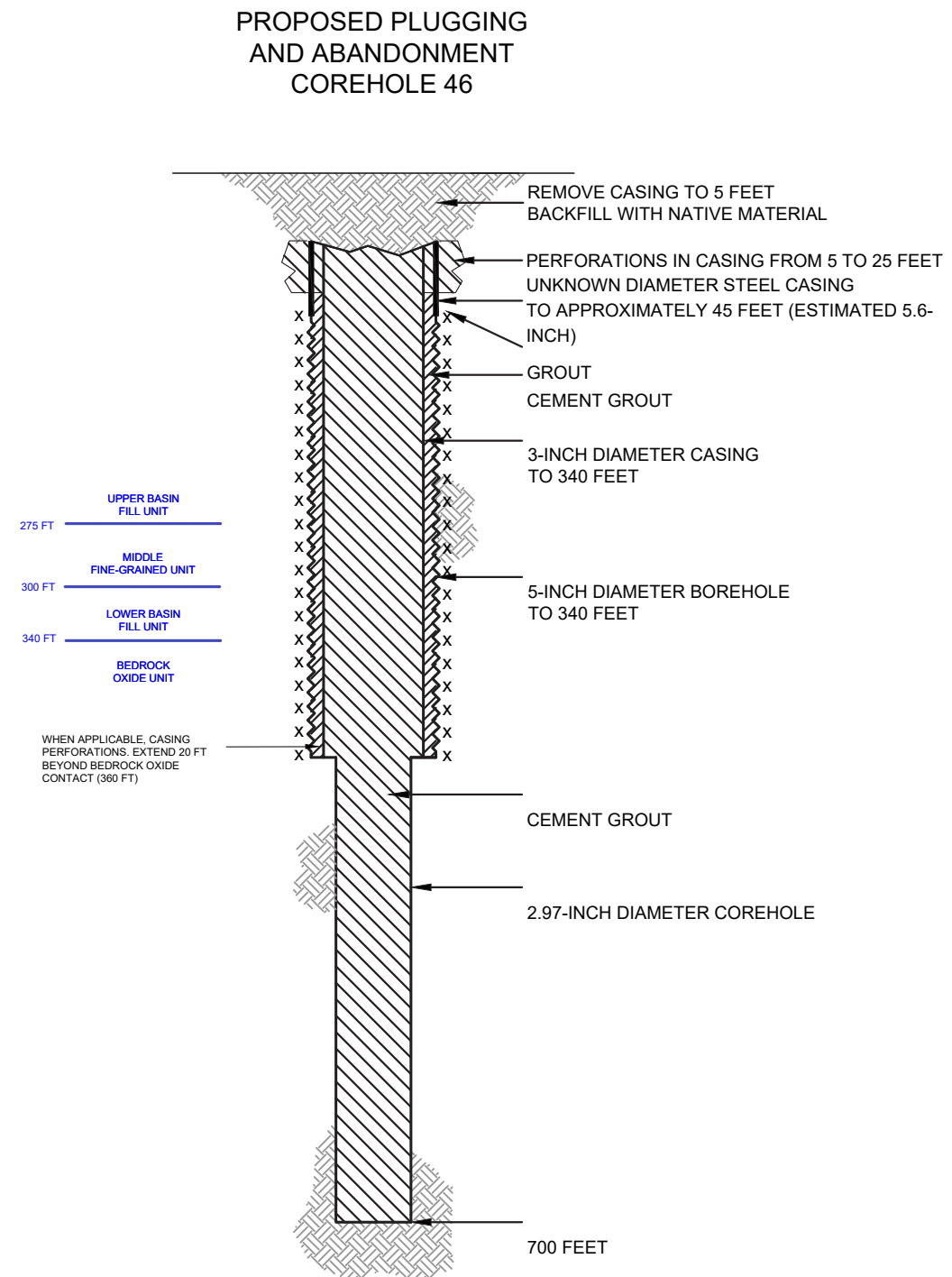
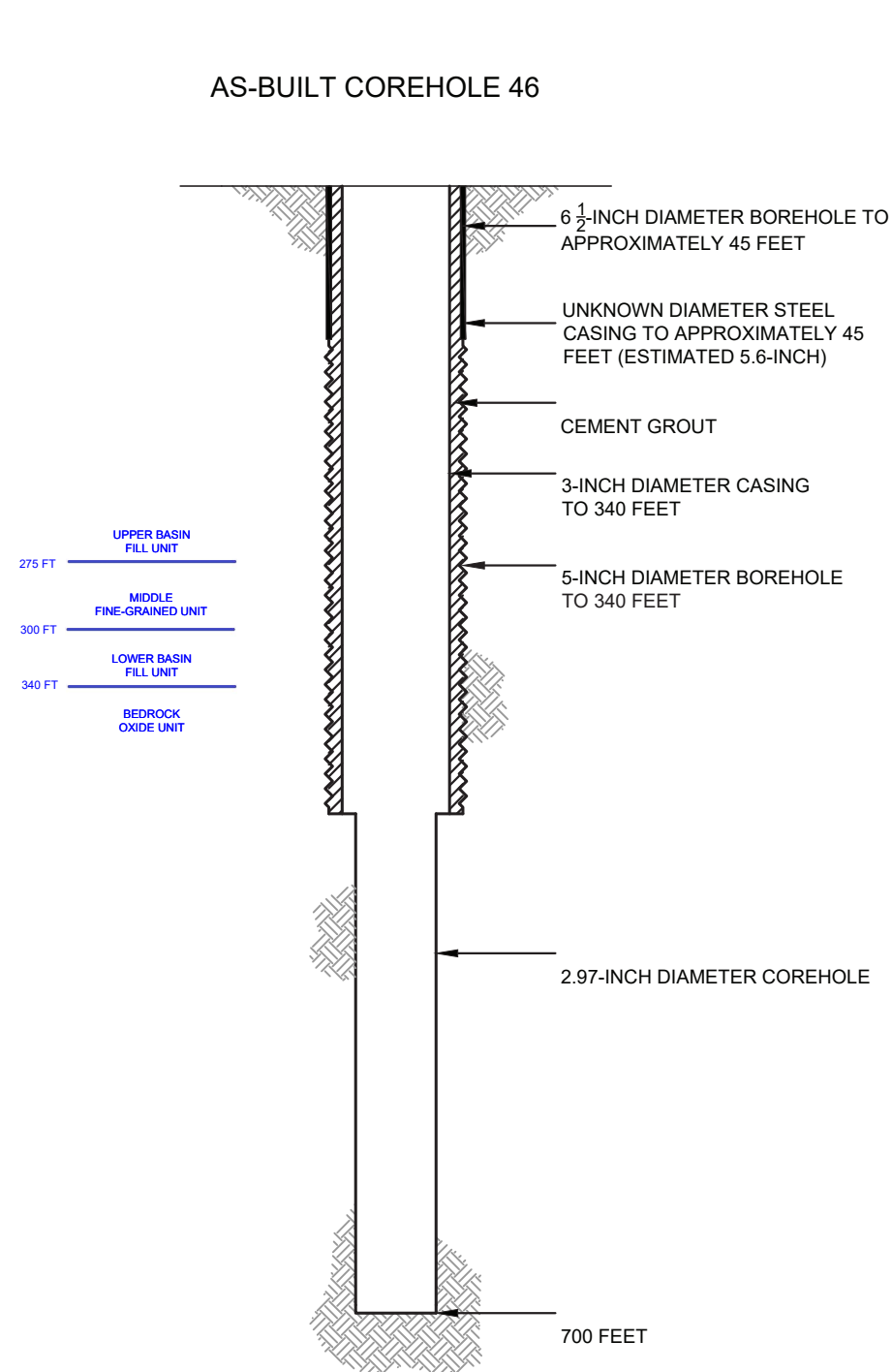
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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 46 DIAGRAM



NOT TO SCALE
SEPTEMBER 2019

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

47S

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.0521918

Surface Location

NW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4281235

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021
☐ Report After Work
Date Work Ended

- ☐ Well Rework
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☐ Conversion to a Non-Injection Well

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Name and Official Title (Please type or print)

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Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

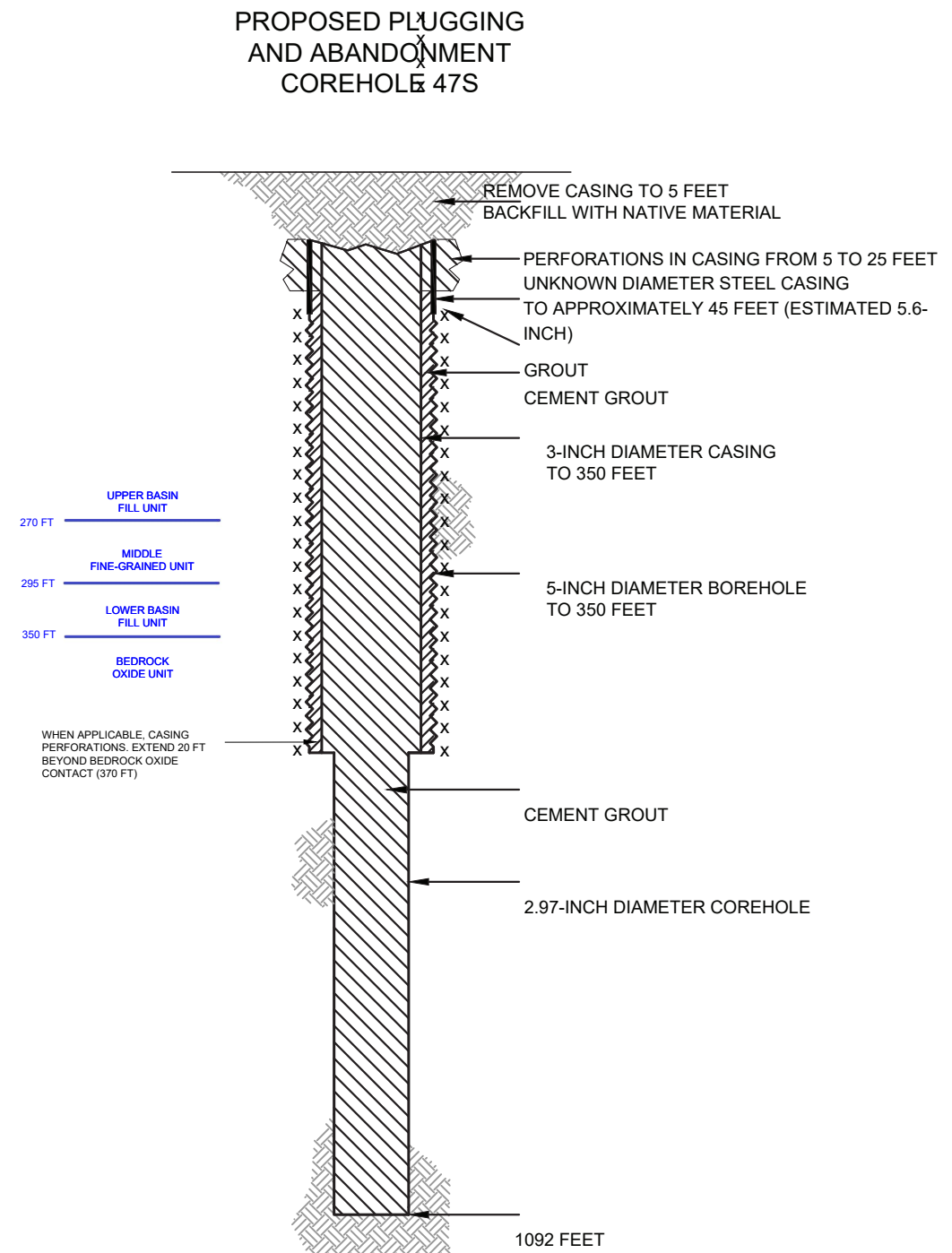
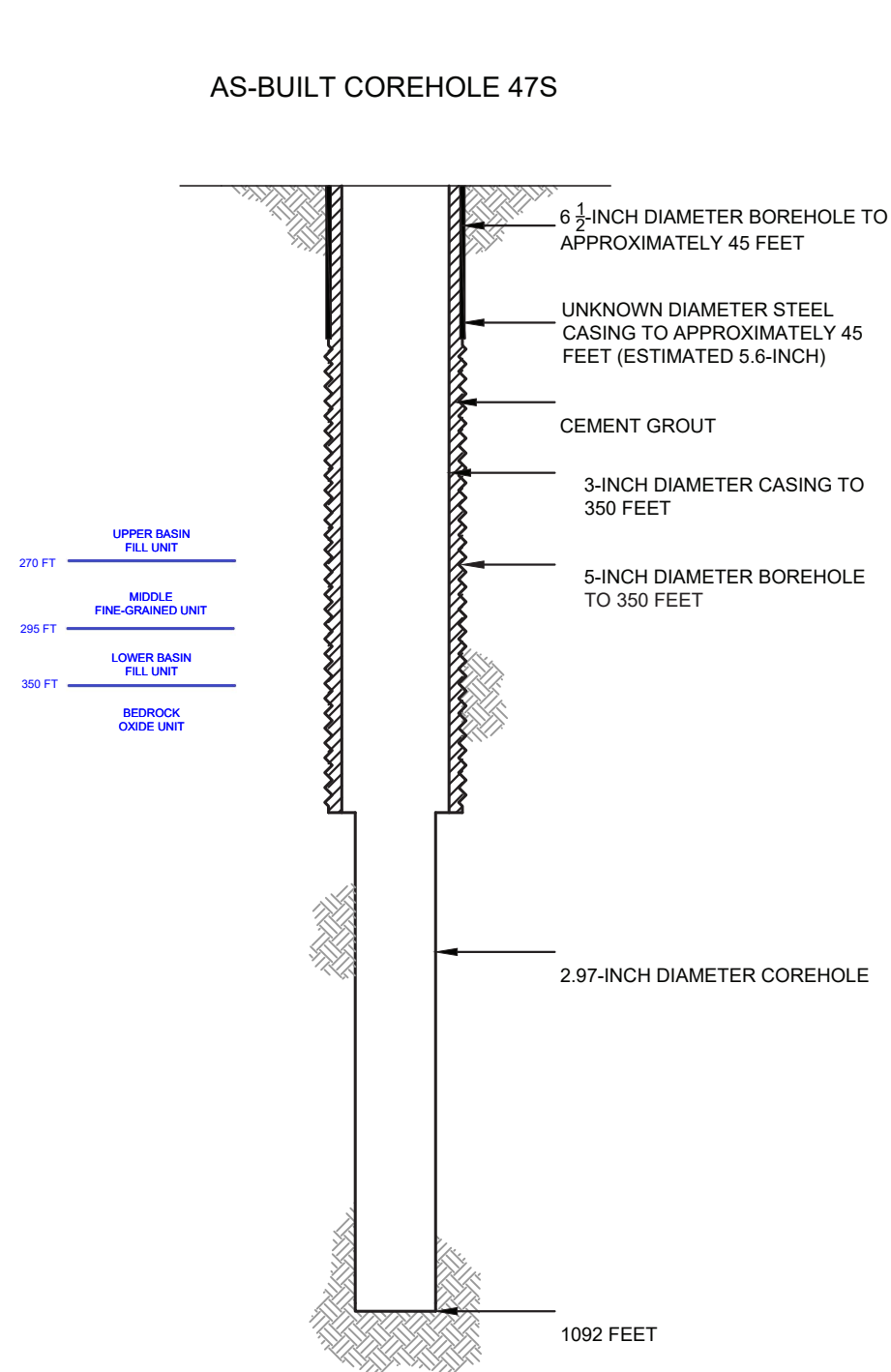
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 47S DIAGRAM



NOT TO SCALE
SEPTEMBER 2019

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

51S

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05010833

Surface Location

NW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4371128

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open core hole from the bottom of the core hole to the top of the core hole. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated intervals, as necessary.

If the hole has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the core hole.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

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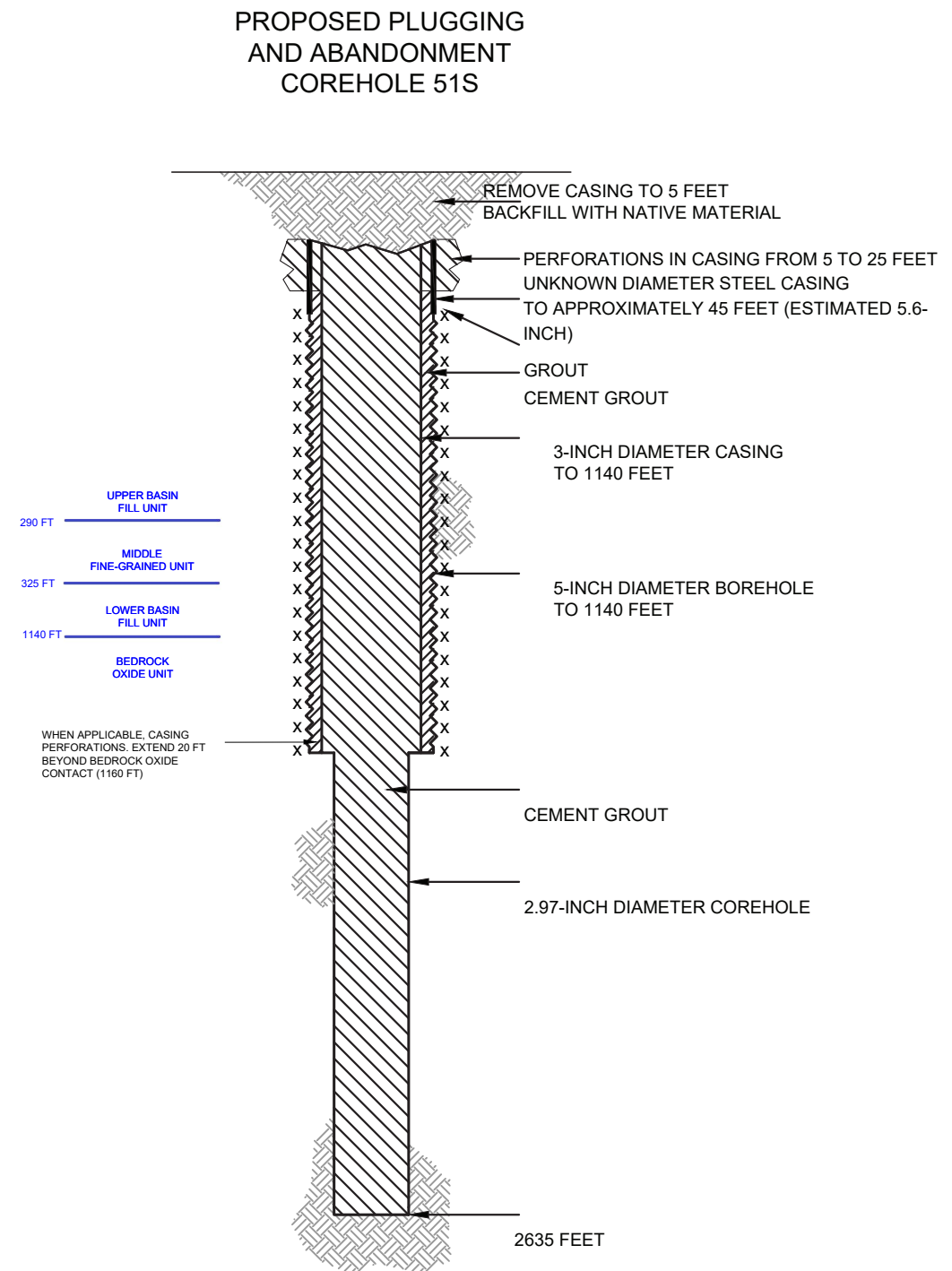
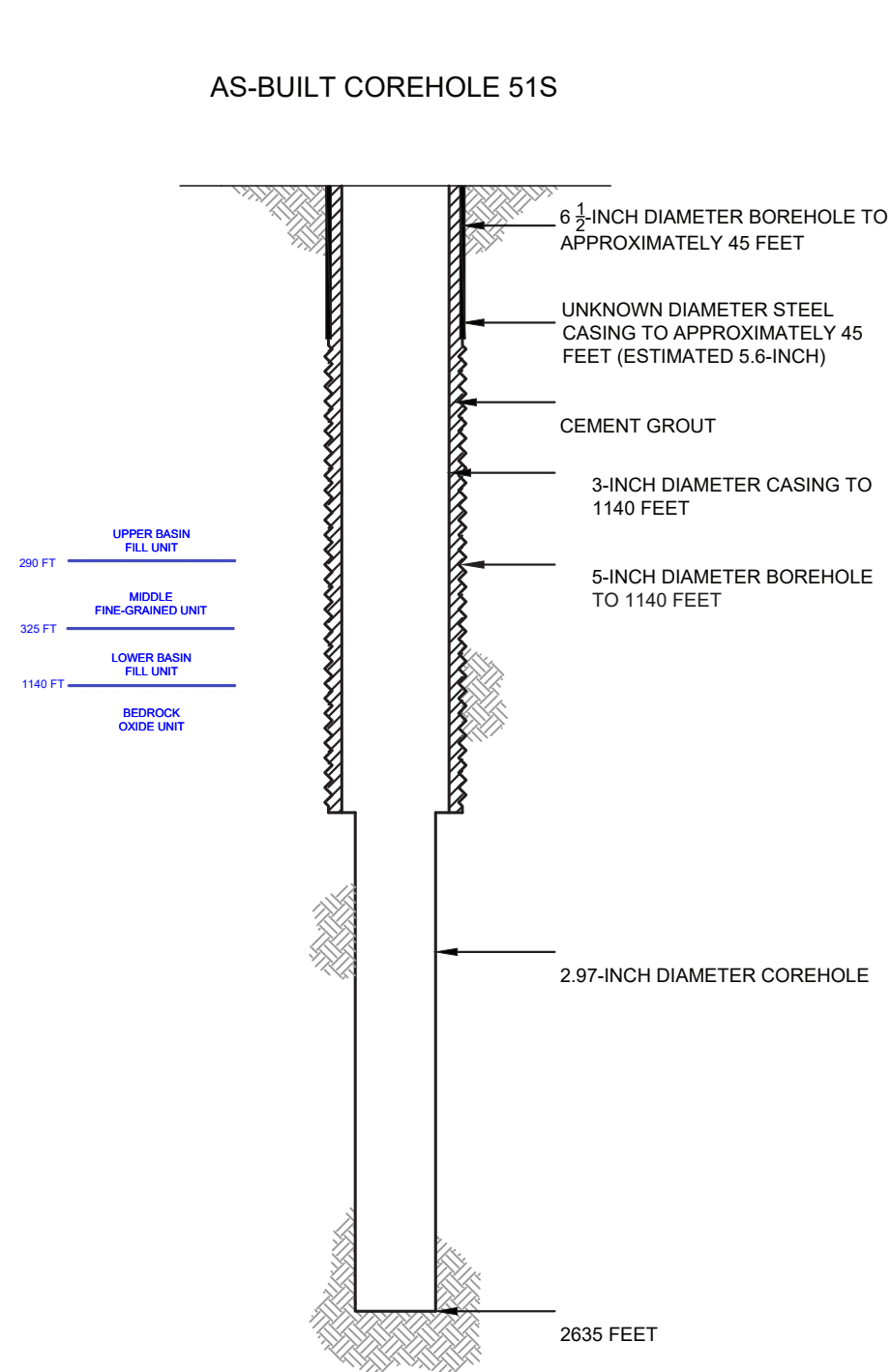
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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 51S DIAGRAM



NOT TO SCALE
SEPTEMBER 2019

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

52S

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05219549

Surface Location

NW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4257031

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

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A tremie pipe will be used to place Type V cement in the open core hole from the bottom of the core hole to the top of the core hole. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated intervals, as necessary.

If the hole has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the core hole.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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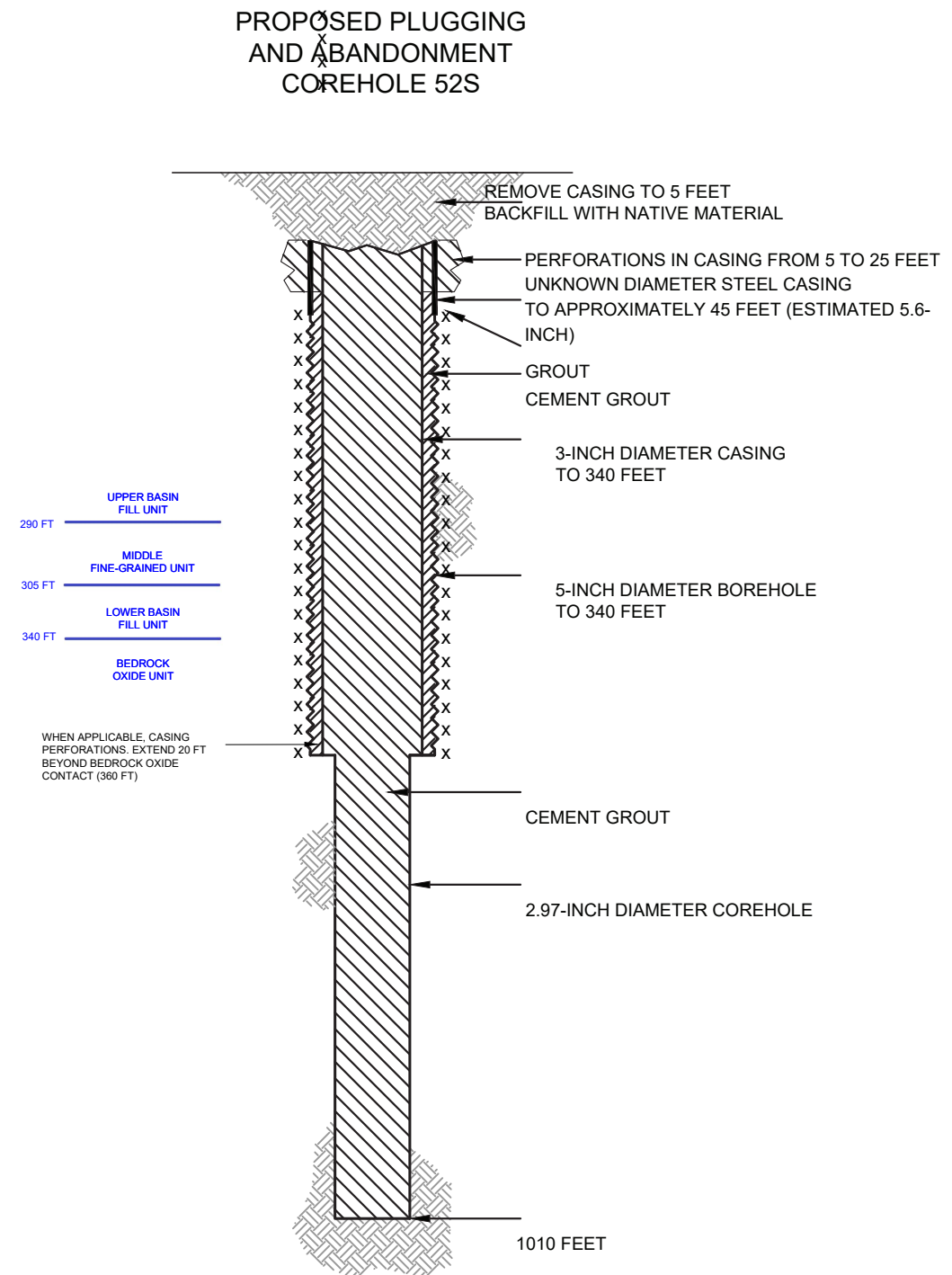
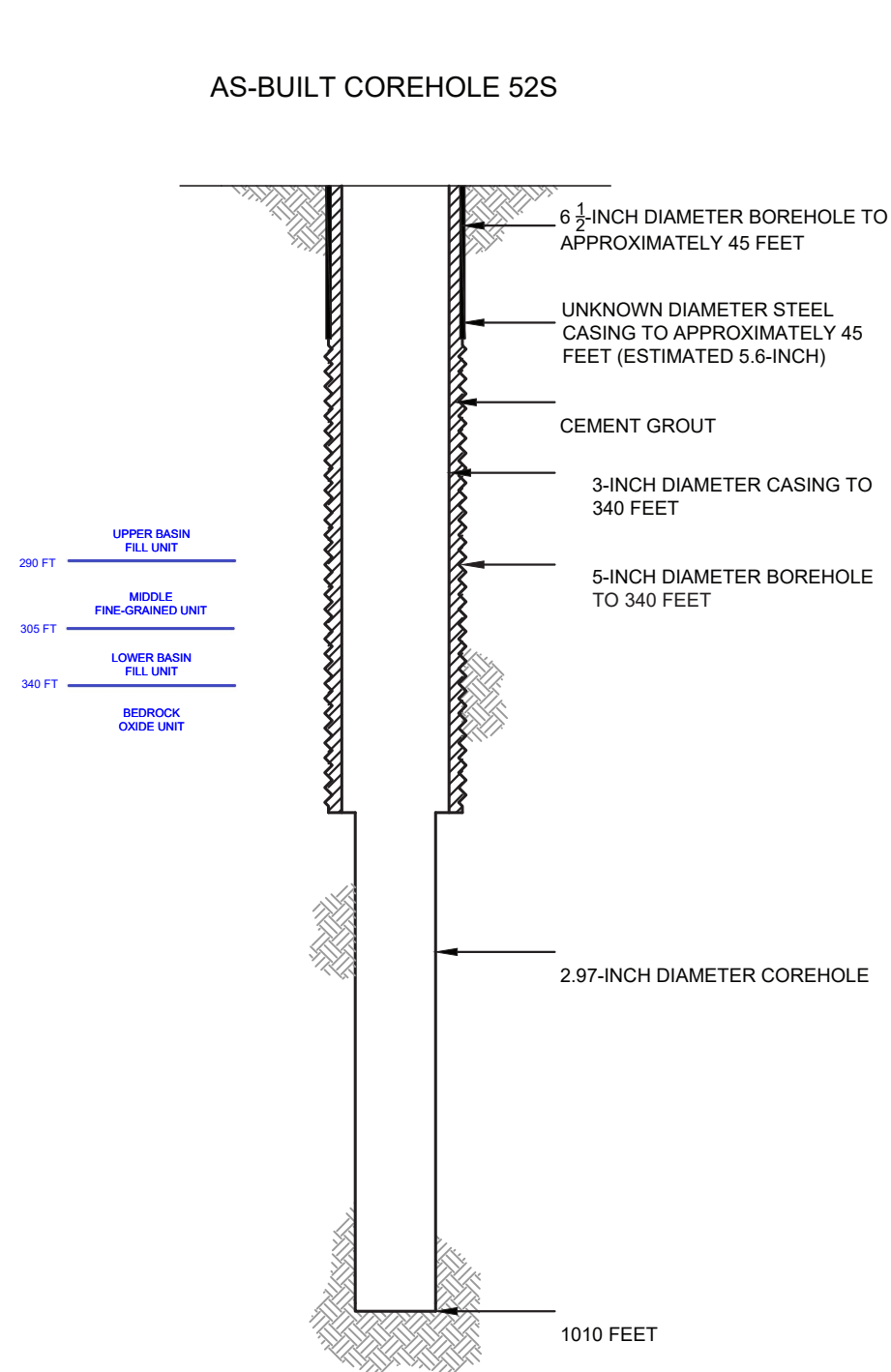
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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 52S DIAGRAM



NOT TO SCALE
SEPTEMBER 2019

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

55MF

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04500674

Surface Location

NE 1/4 of NW 1/4 of Section 33 Township 4S Range 9E

Longitude -111.4338669

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
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Signature

Date Signed

10/3/2019

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Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

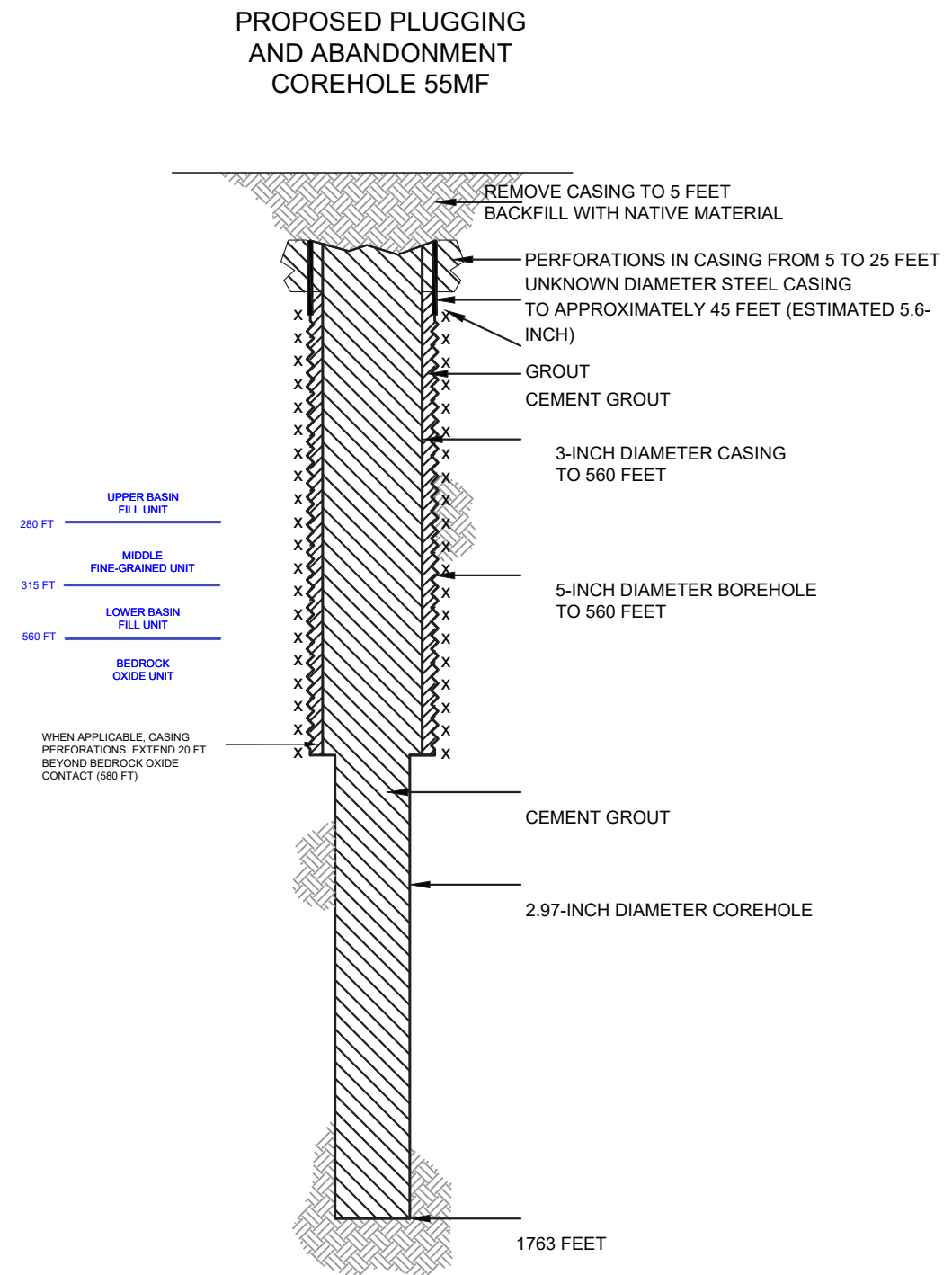
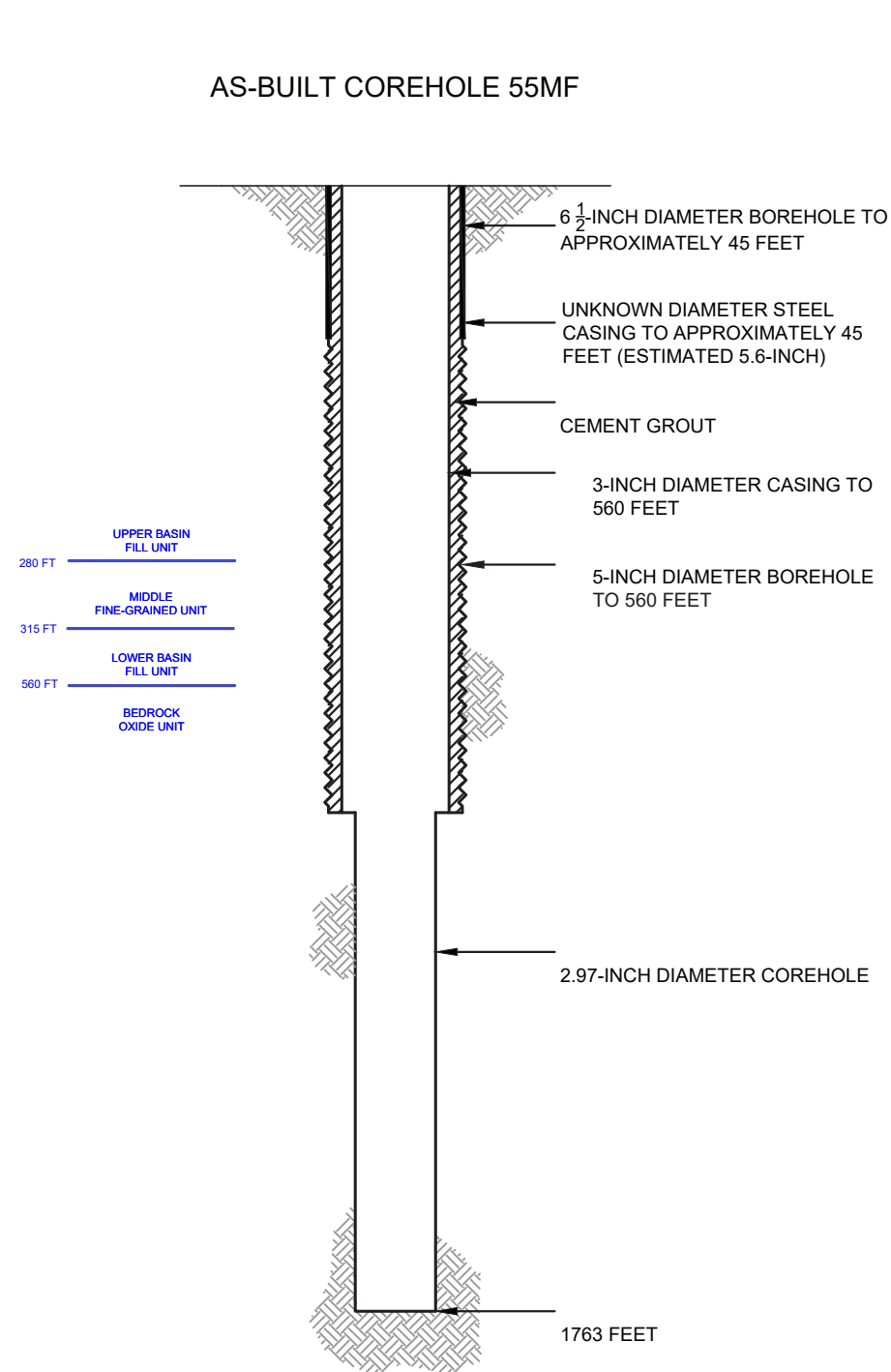
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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 55MF DIAGRAM



NOT TO SCALE
SEPTEMBER 2019

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

56MF

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04750213

Surface Location

SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.425677942

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open core hole from the bottom of the core hole to the top of the core hole. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated intervals, as necessary.

If the hole has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the core hole.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

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Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

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For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

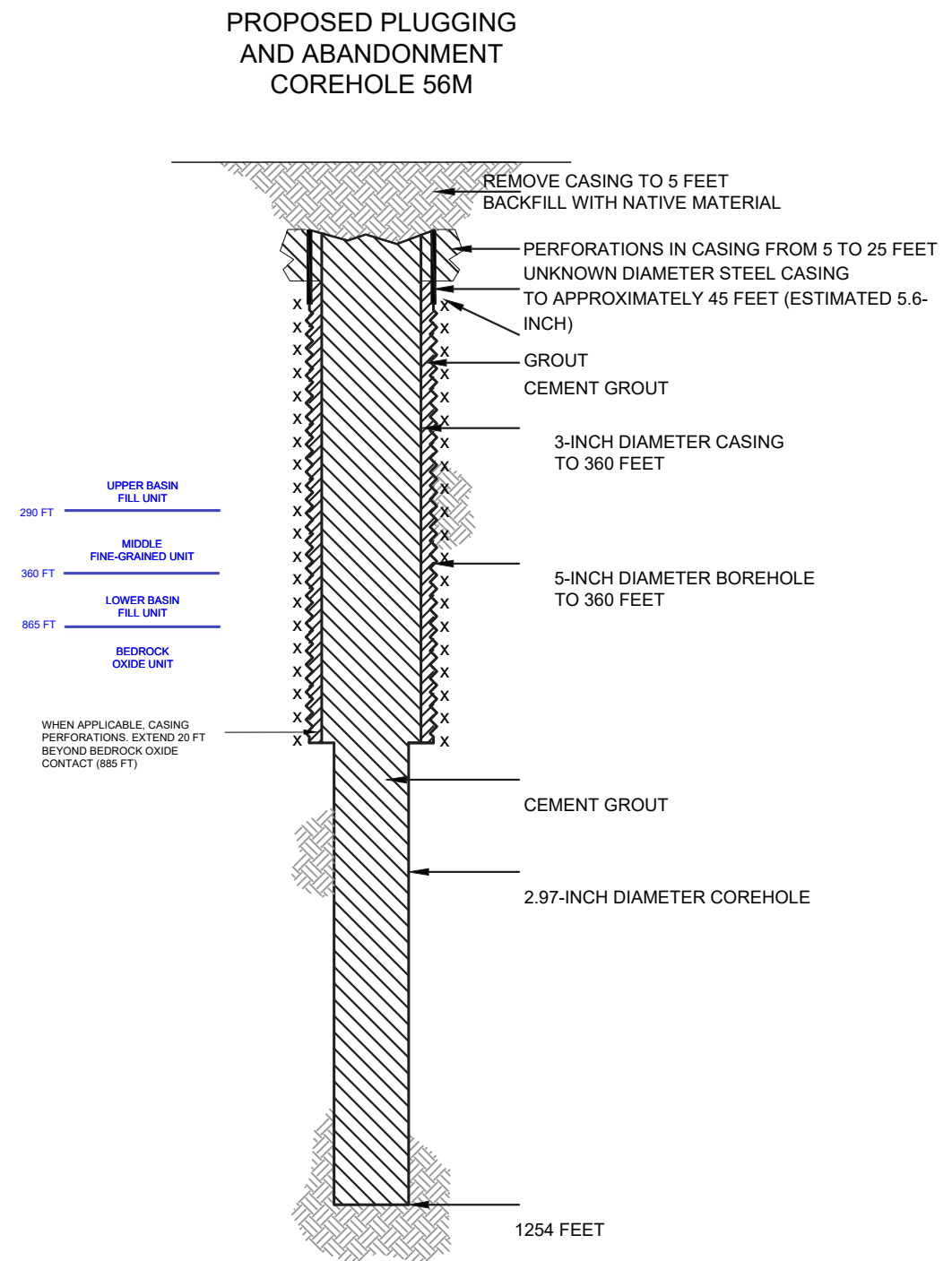
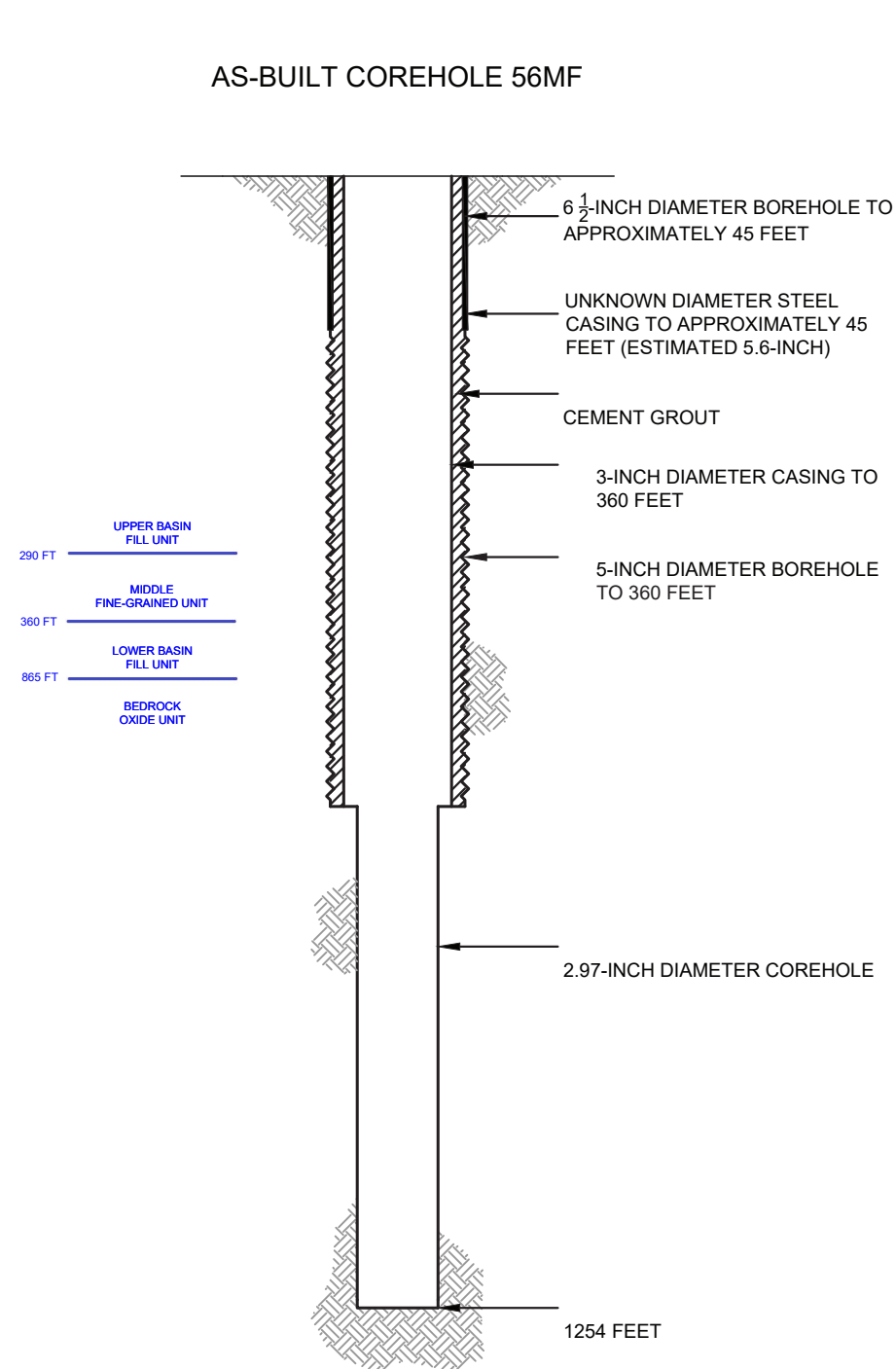
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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 56MF DIAGRAM



NOT TO SCALE
SEPTEMBER 2019

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

60MF

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04381175

Surface Location

NE 1/4 of NW 1/4 of Section 33 Township 4S Range 9E

Longitude -111.4314139

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

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A tremie pipe will be used to place Type V cement in the open core hole from the bottom of the core hole to the top of the core hole. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated intervals, as necessary.

If the hole has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the core hole.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

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WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

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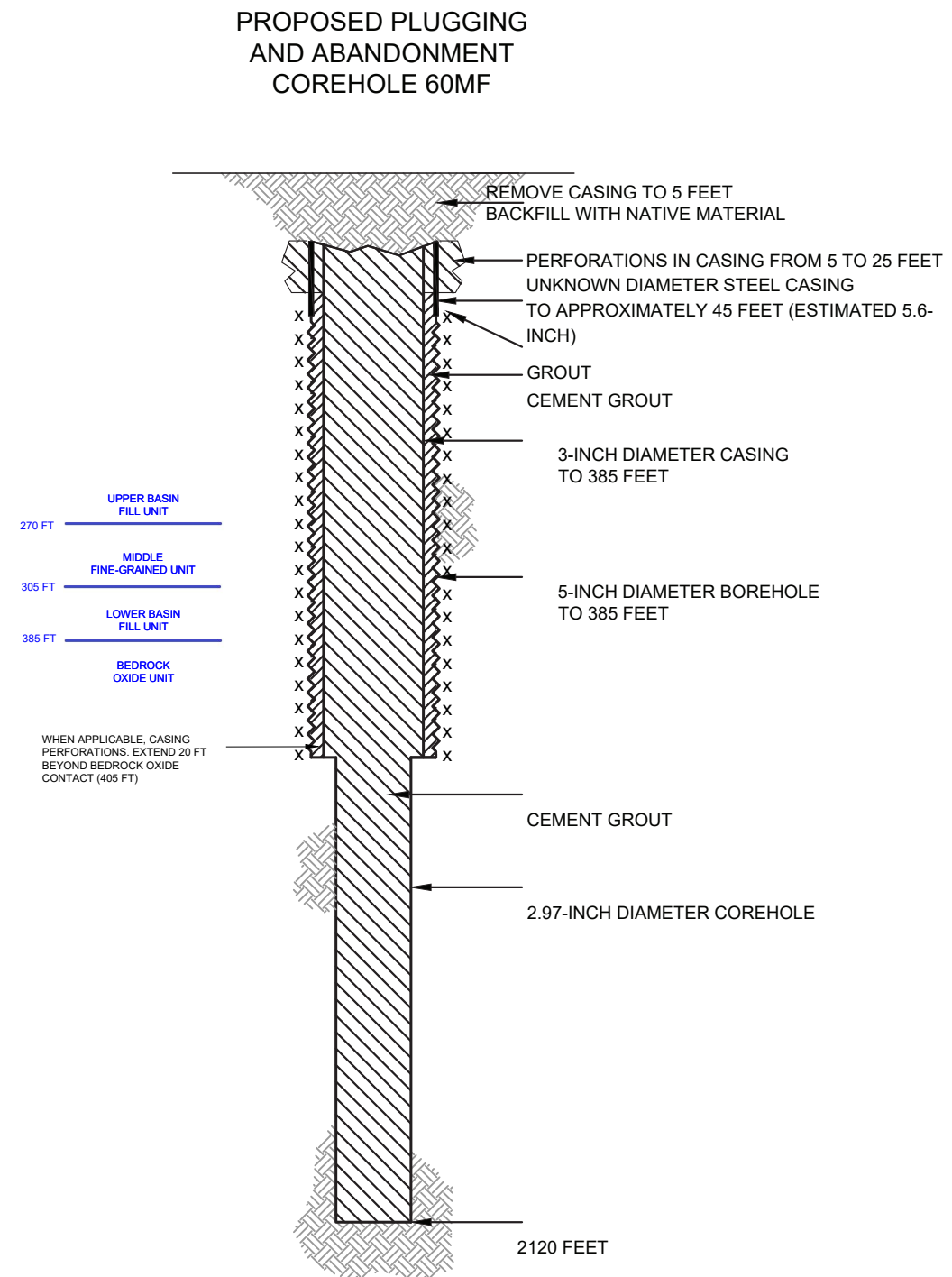
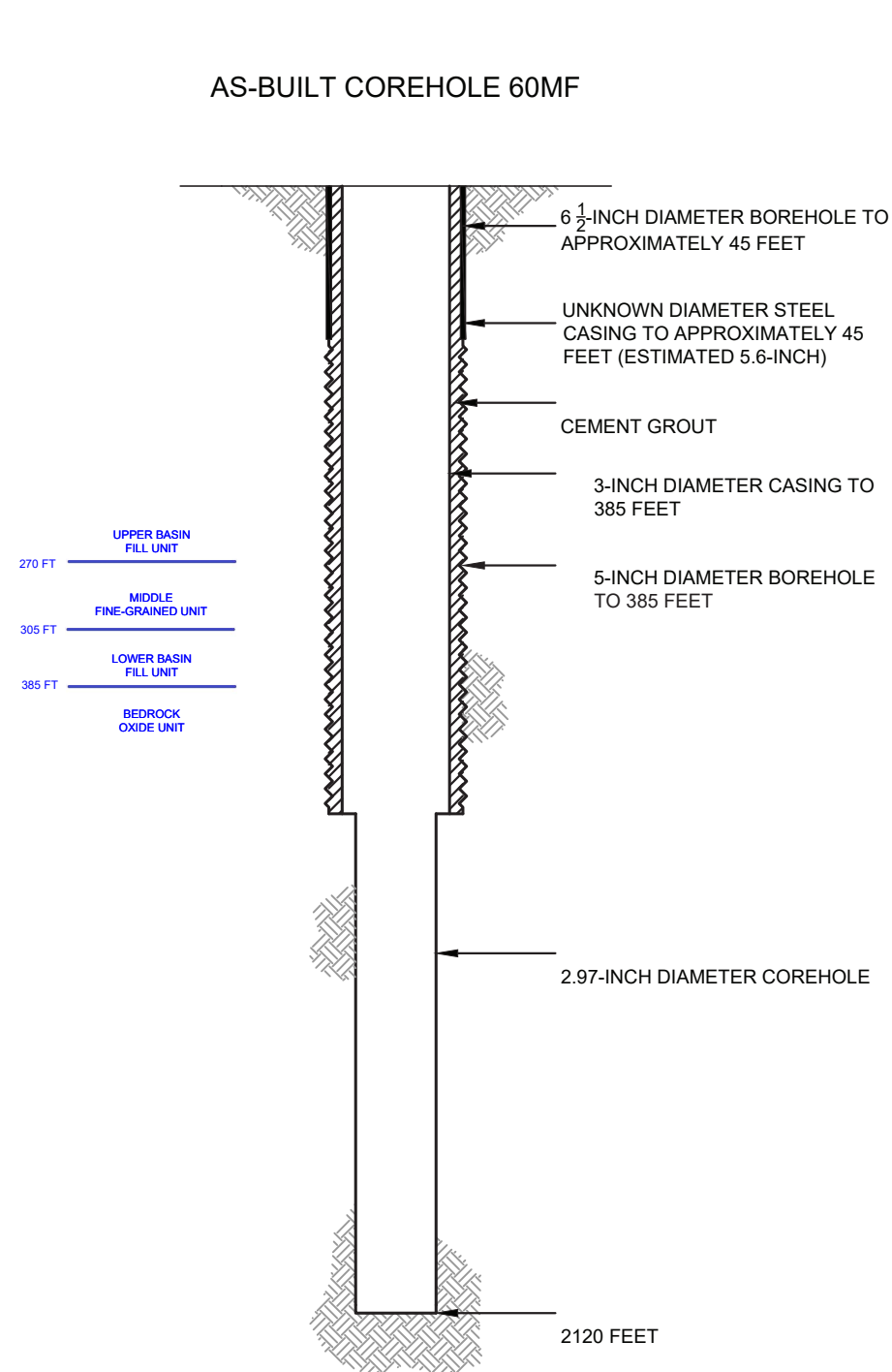
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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 60MF DIAGRAM



NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

62MF

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04855595

Surface Location

SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4281272

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

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Signature

Date Signed

10/3/2019

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WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

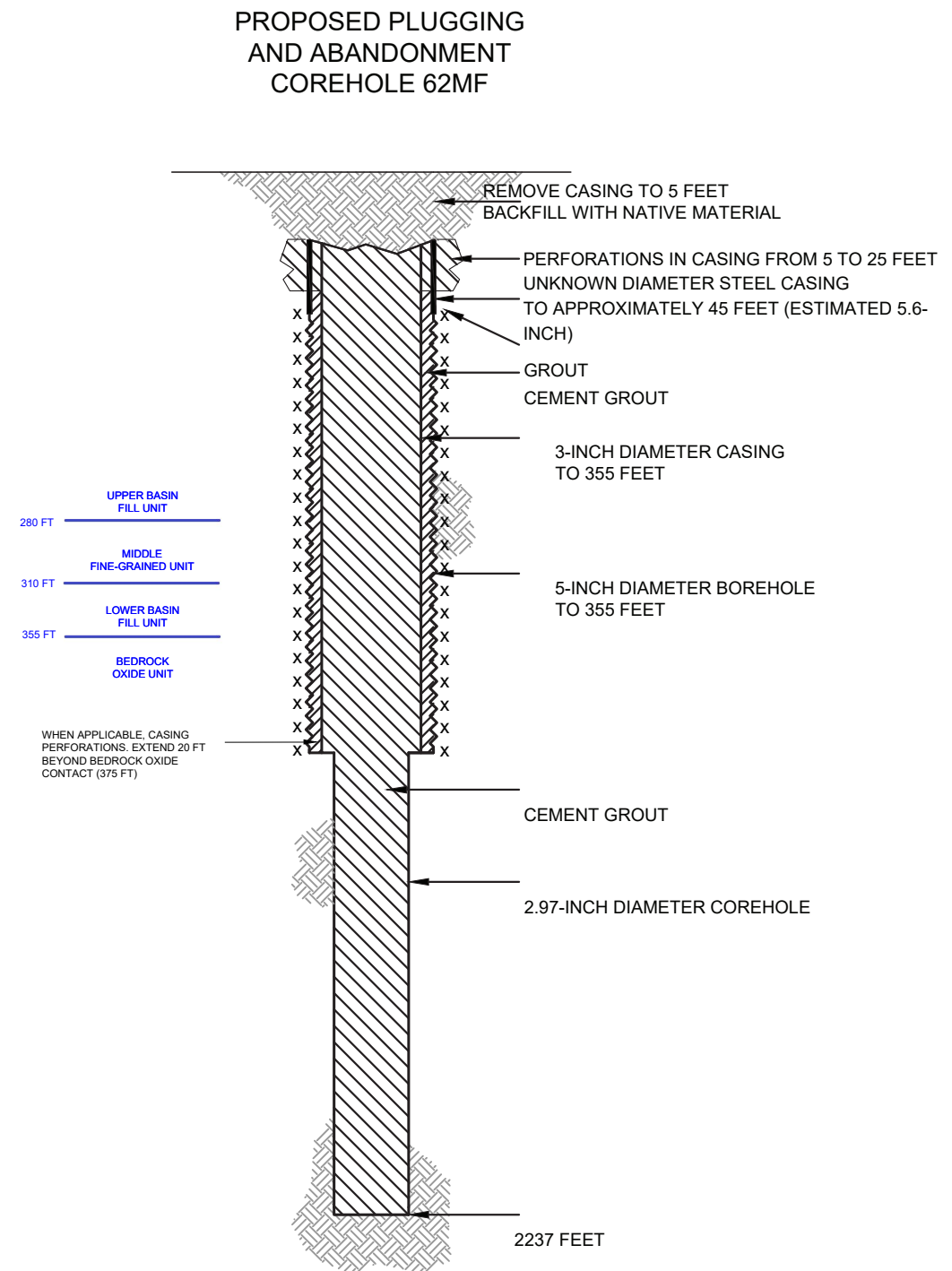
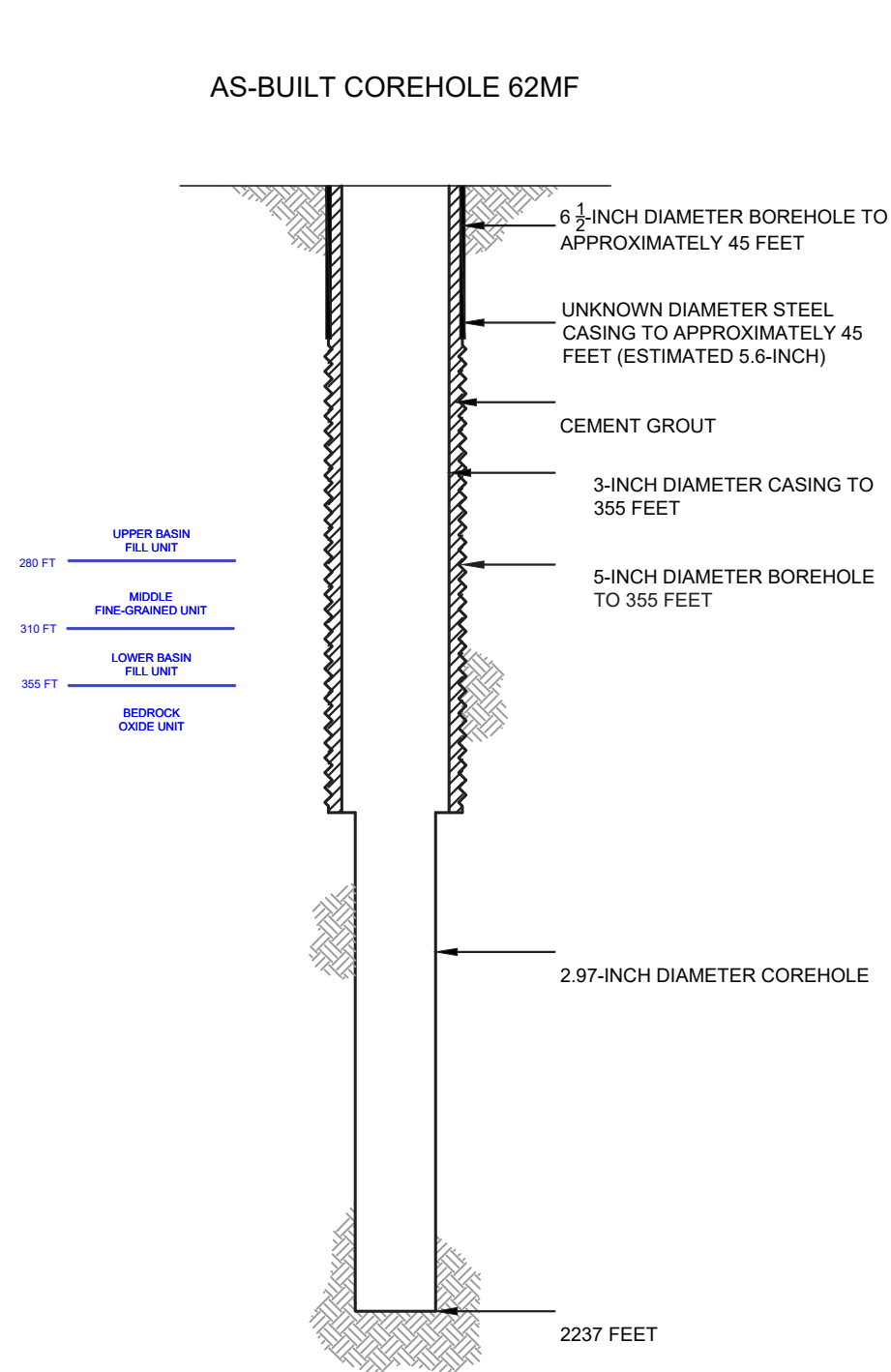
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 62MF DIAGRAM



NOT TO SCALE
SEPTEMBER 2019

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

67S

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05000653

Surface Location

NW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4289355

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open core hole from the bottom of the core hole to the top of the core hole. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated intervals, as necessary.

If the hole has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the core hole.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

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For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

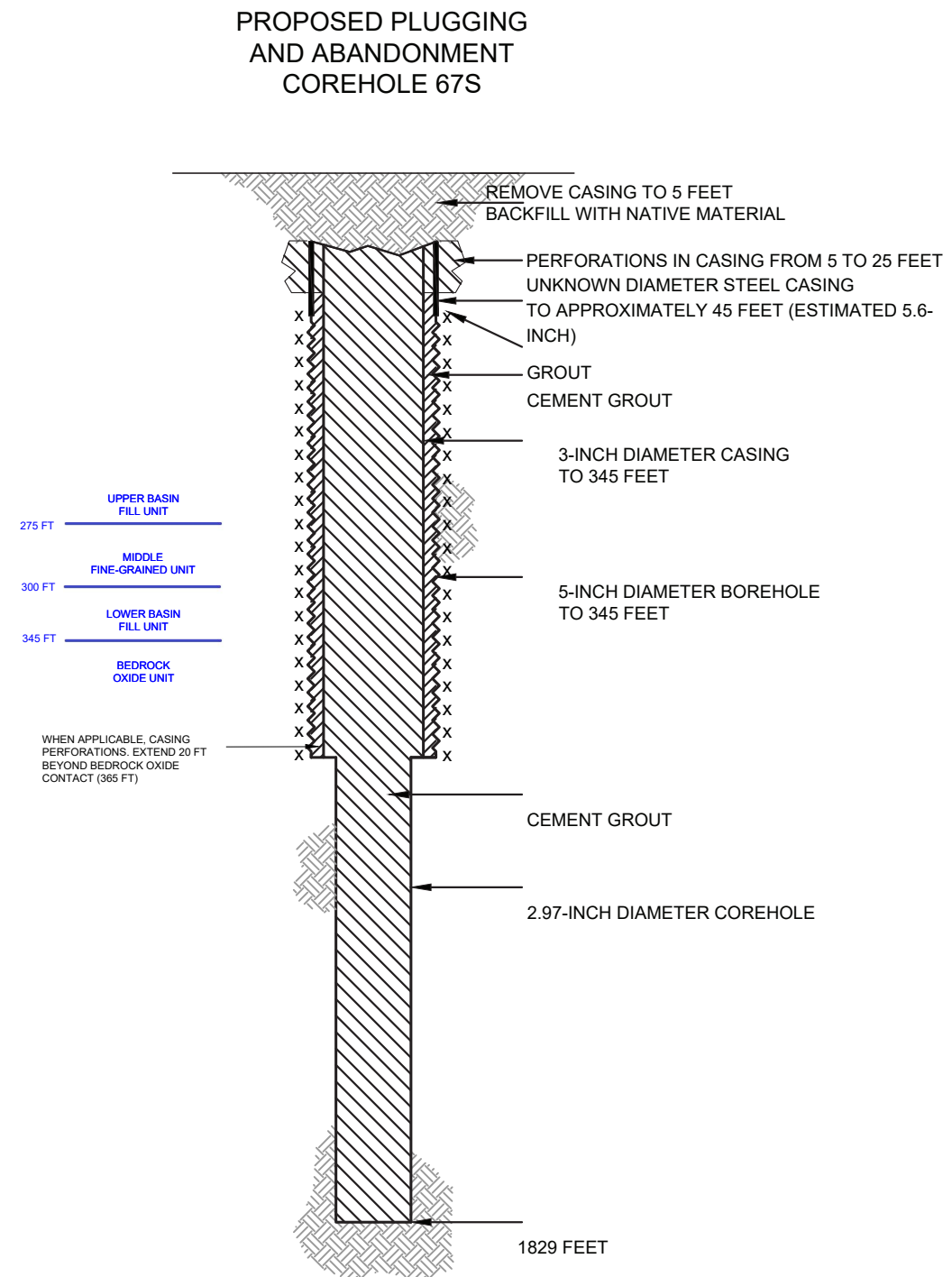
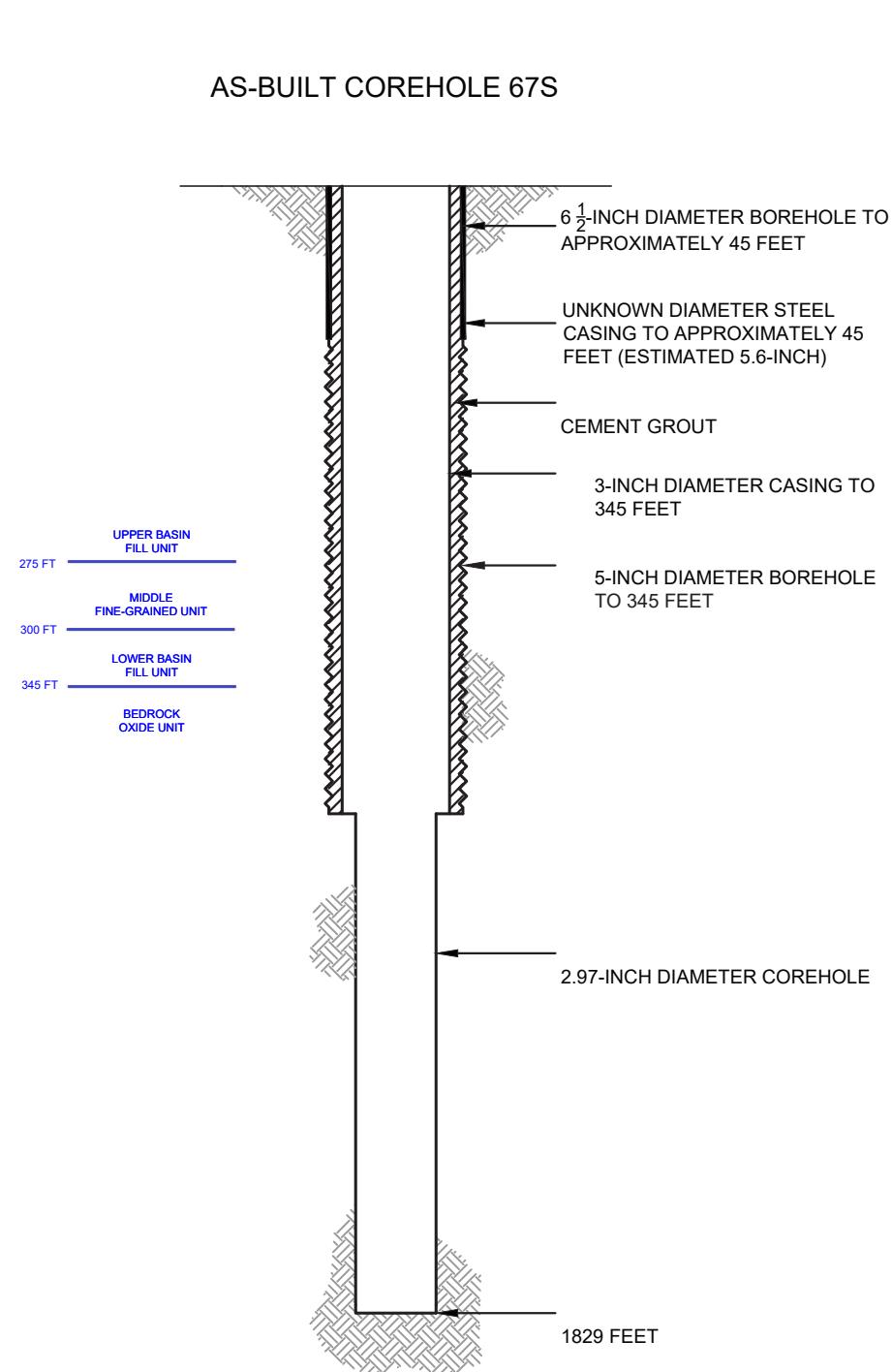
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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

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CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 67S DIAGRAM



NOT TO SCALE
SEPTEMBER 2019

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

68MF

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04619785

Surface Location

SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4281119

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open core hole from the bottom of the core hole to the top of the core hole. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated intervals, as necessary.

If the hole has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the core hole.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

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Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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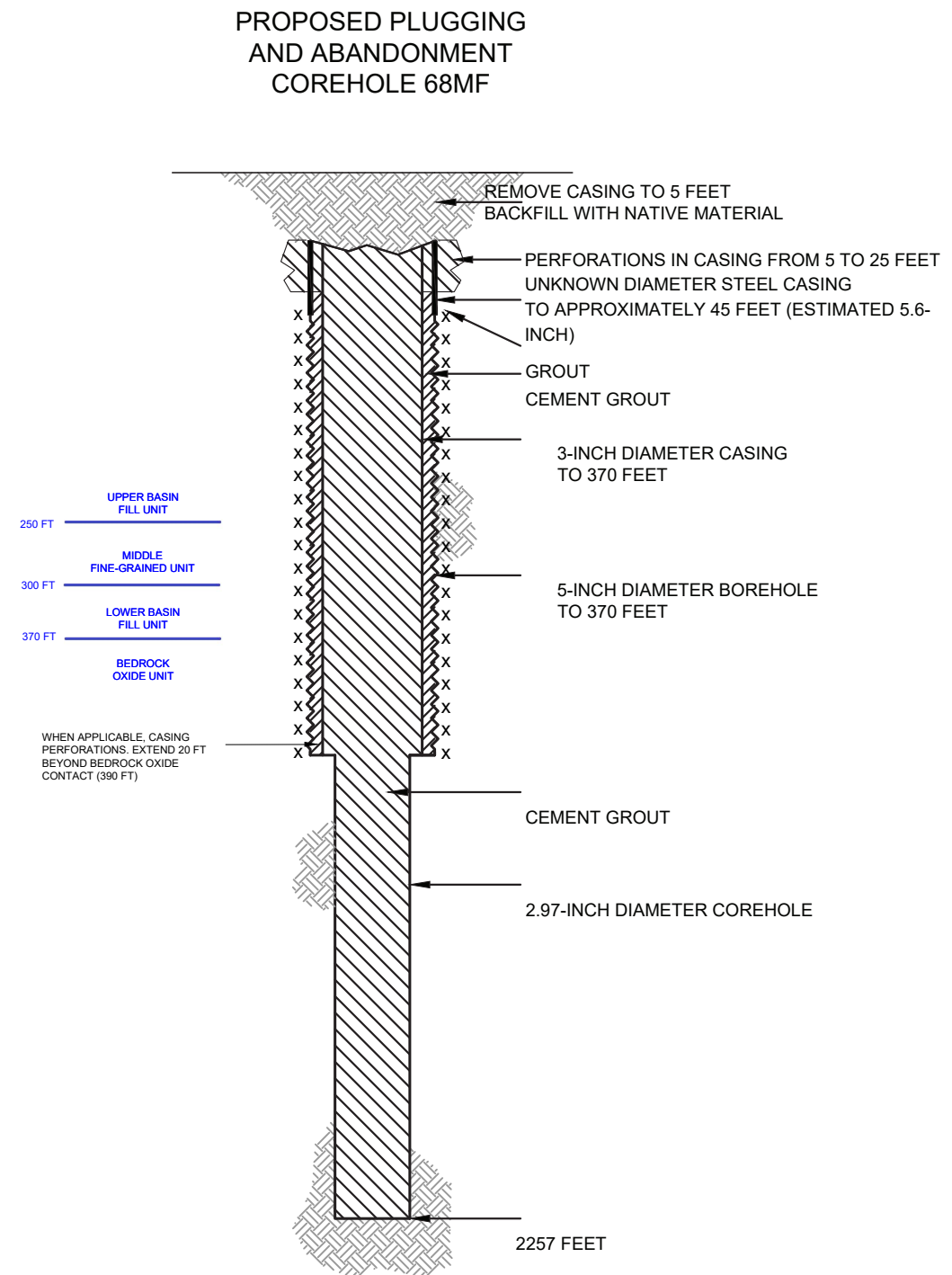
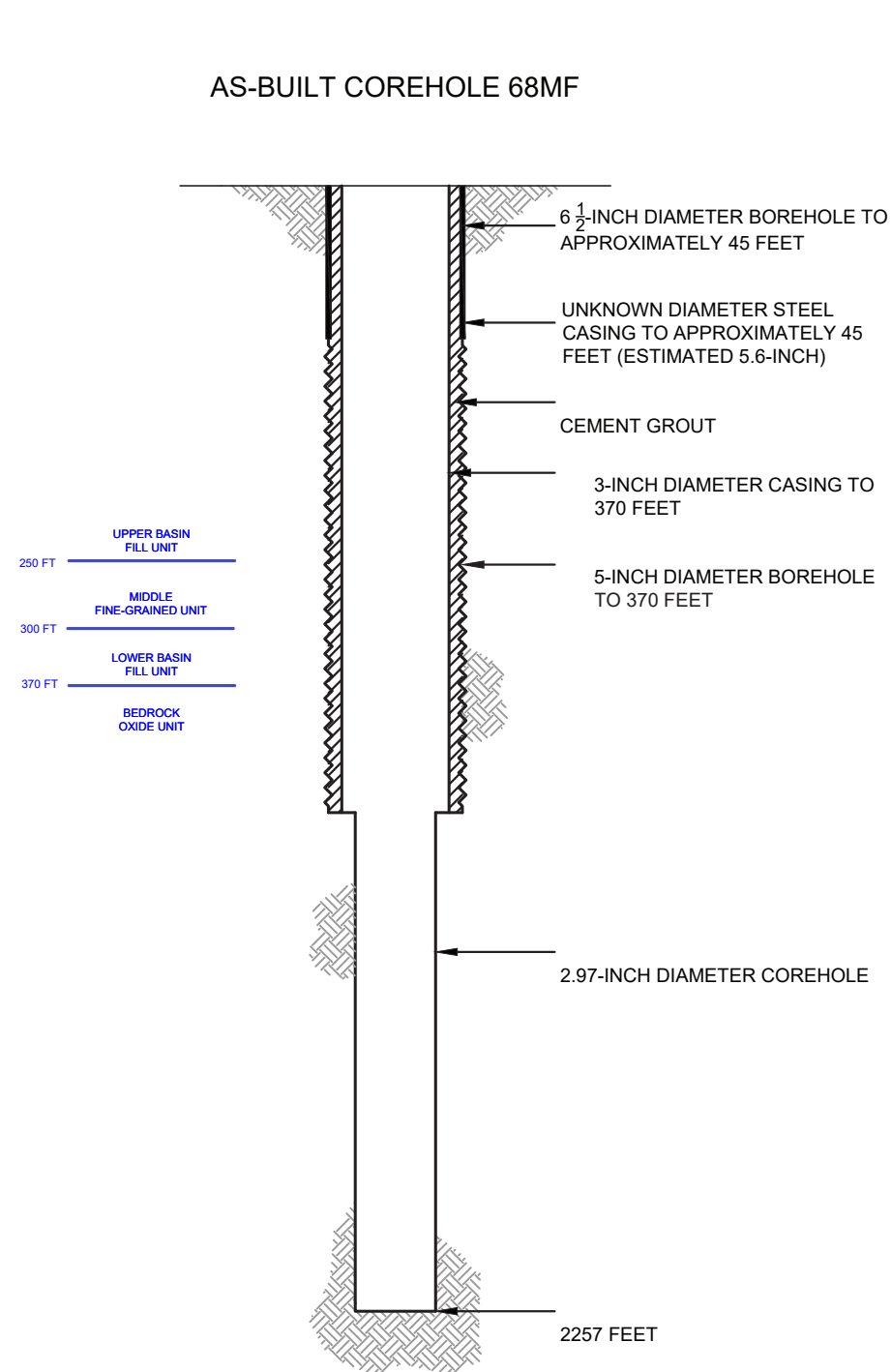
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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 68MF DIAGRAM



NOT TO SCALE
SEPTEMBER 2019

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

69MF

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04614584

Surface Location

SE 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4248778

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021
☐ Report After Work
Date Work Ended

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Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

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Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

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TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

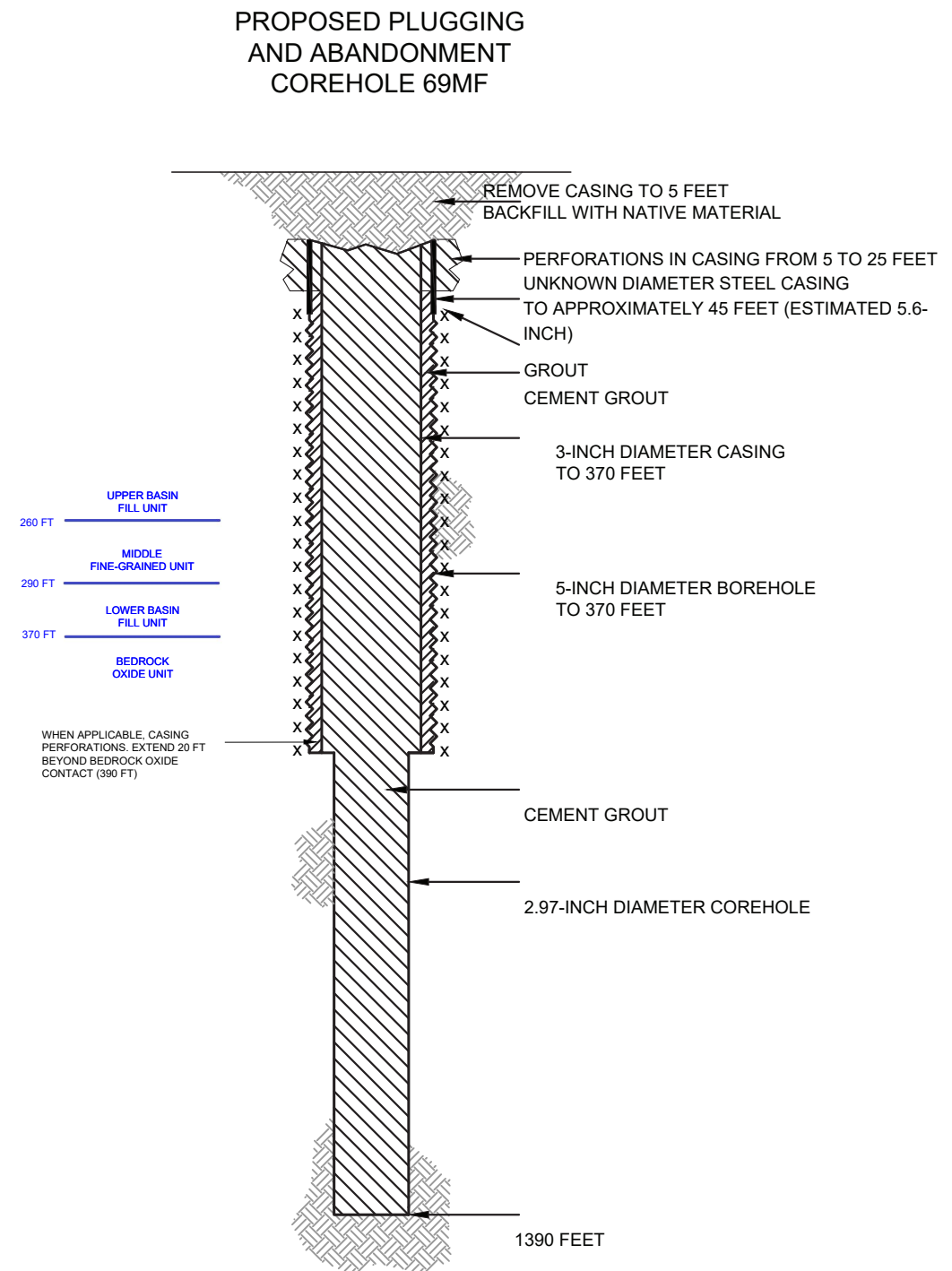
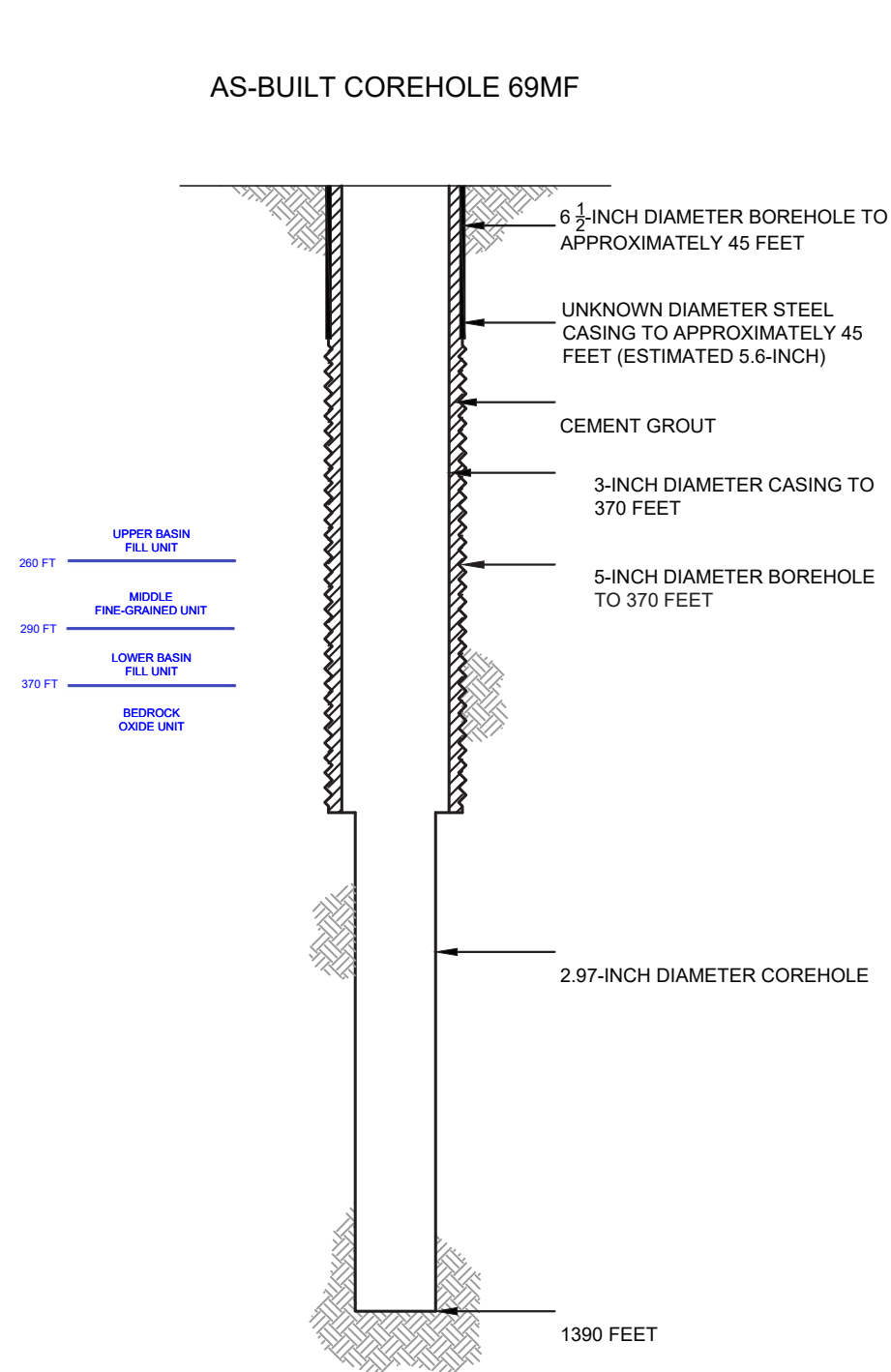
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 69MF DIAGRAM



NOT TO SCALE
SEPTEMBER 2019

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

70MF

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04853383

Surface Location

SE 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4248762

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open core hole from the bottom of the core hole to the top of the core hole. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated intervals, as necessary.

If the hole has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the core hole.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

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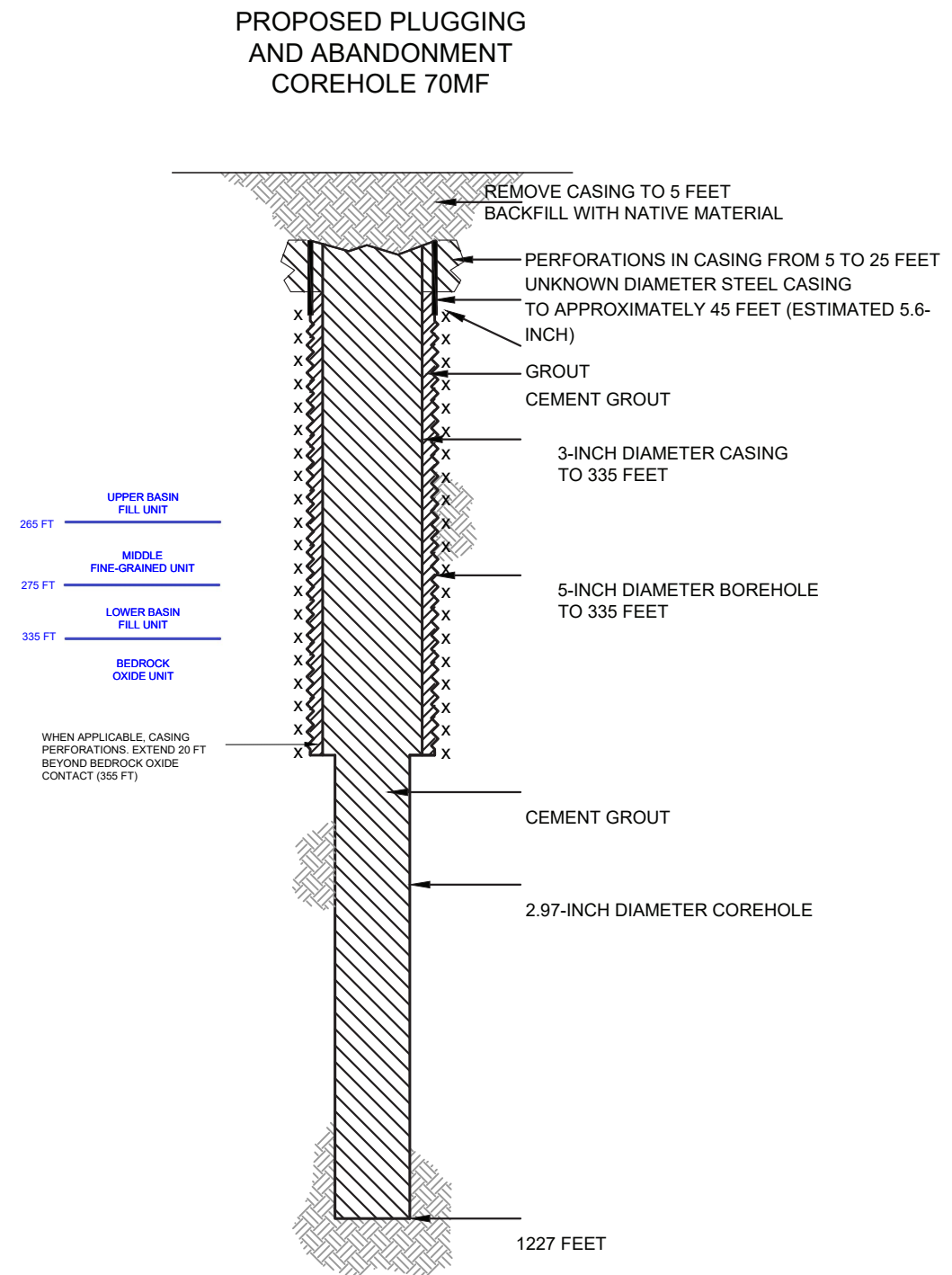
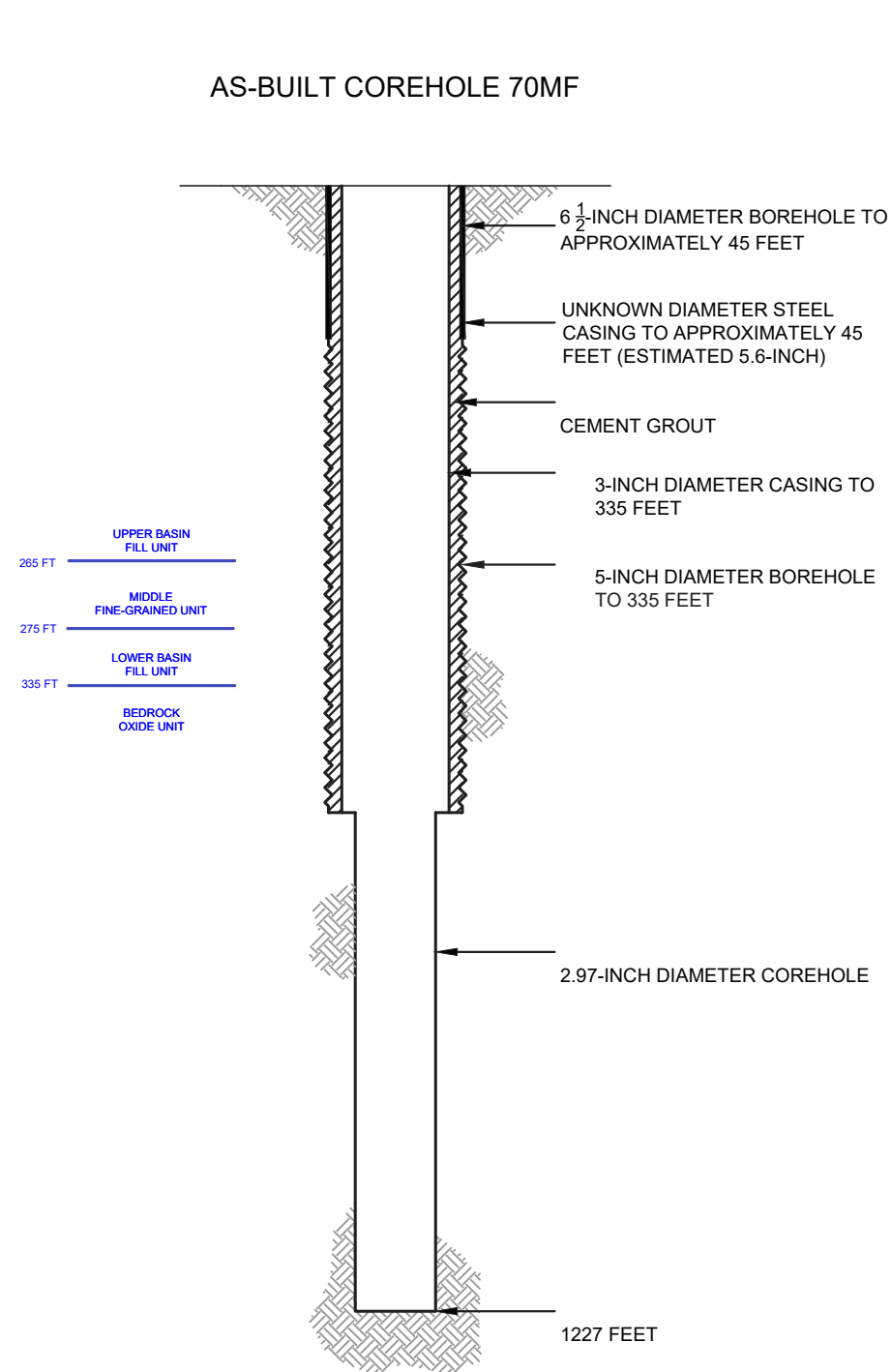
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United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

80S

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05214714

Surface Location

NW 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4370838

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

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10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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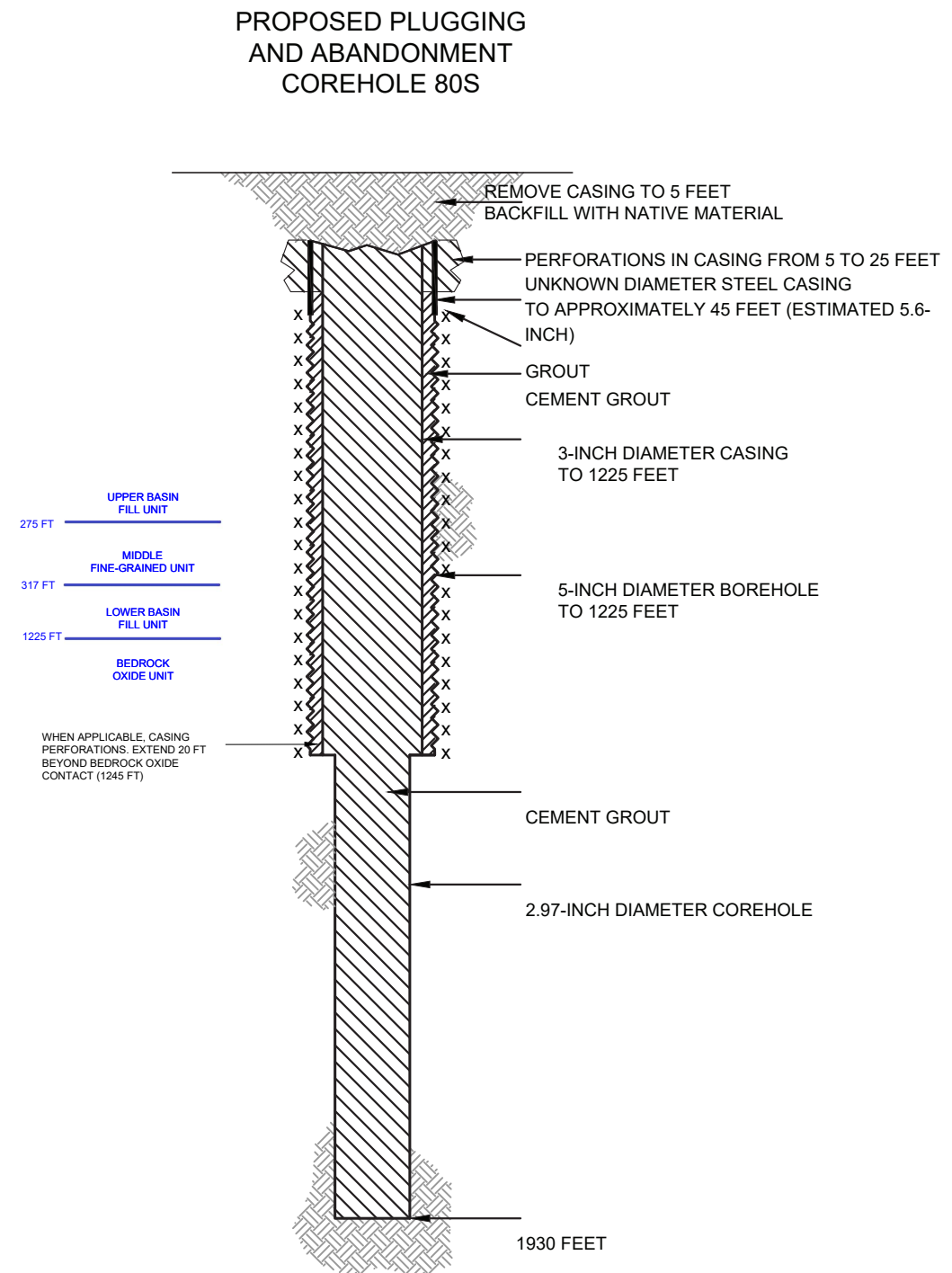
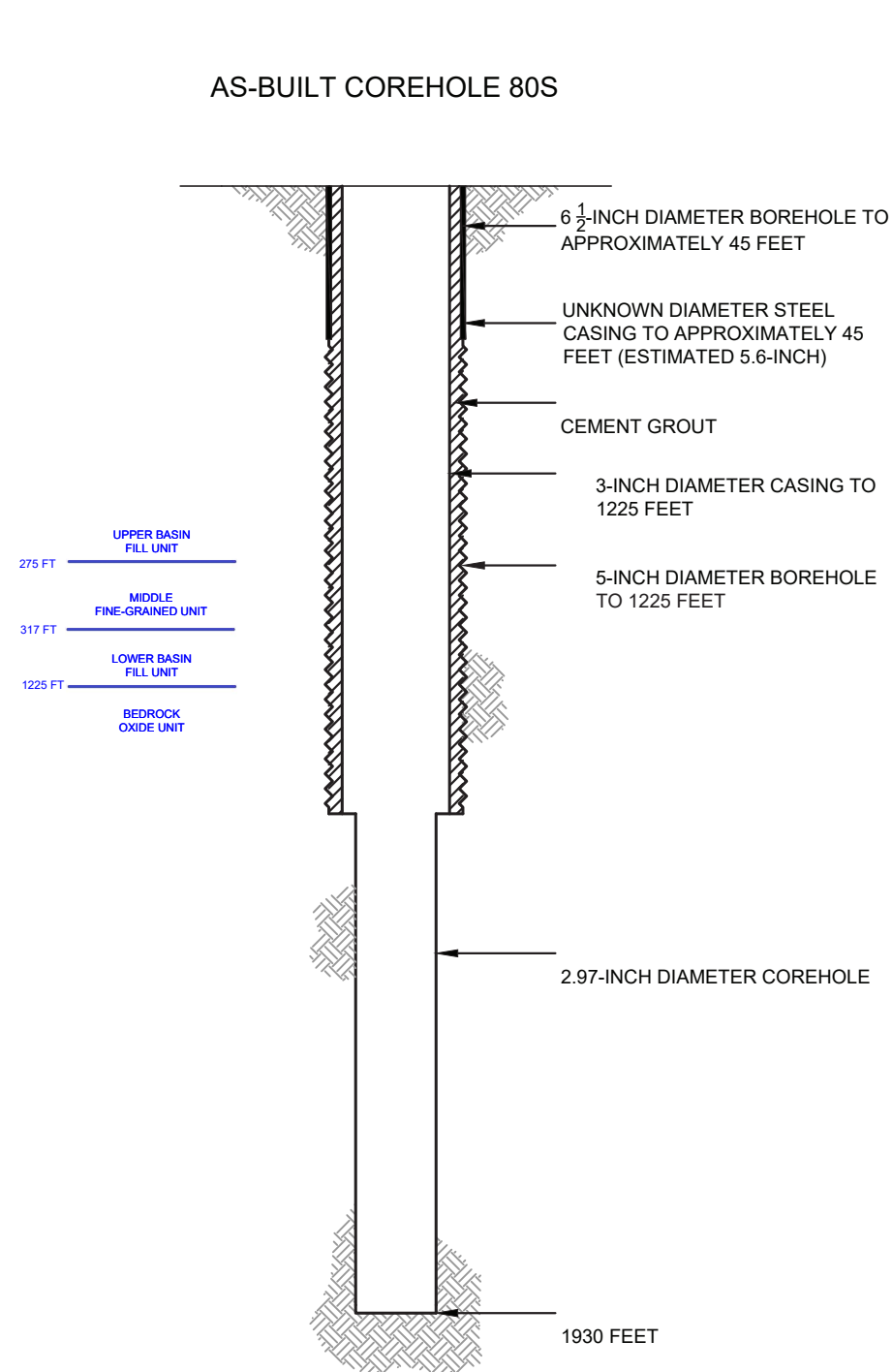
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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 80S DIAGRAM



NOT TO SCALE
SEPTEMBER 2019

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

91S

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.0497287

Surface Location

NE 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4240524

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
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- ☒ Notice Prior to Work
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10/3/2019

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For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

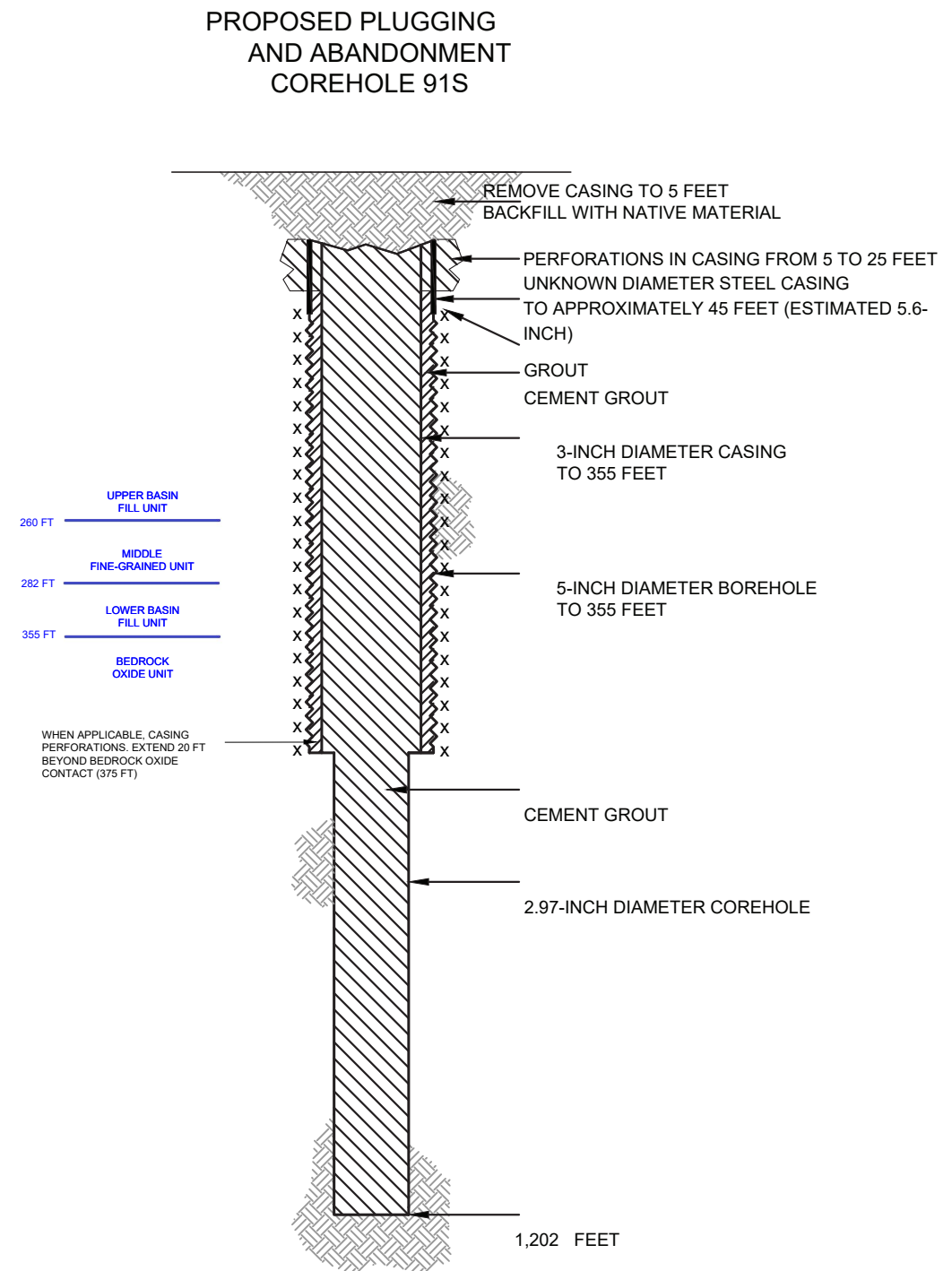
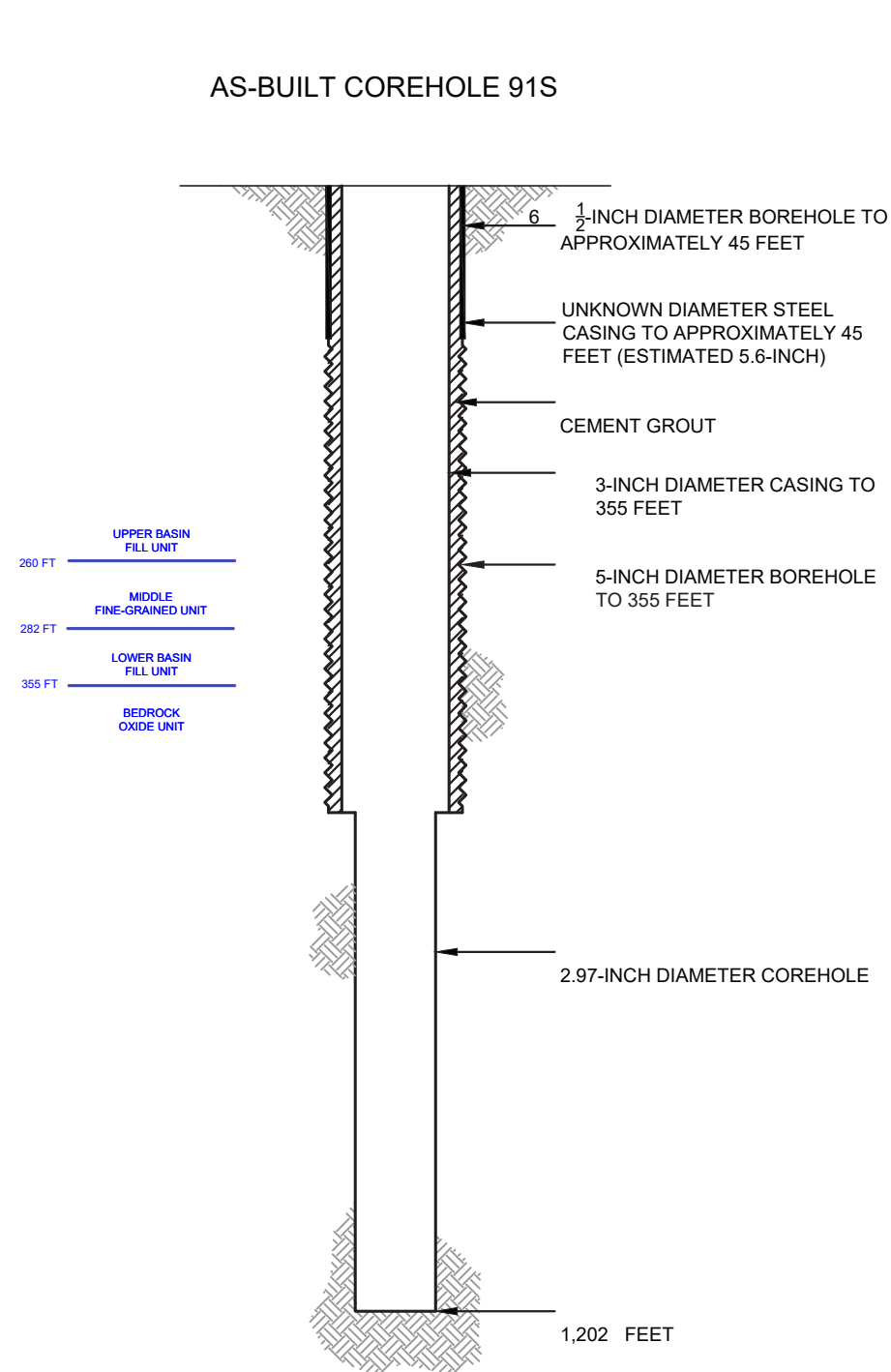
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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 91S DIAGRAM



NOT TO SCALE
SEPTEMBER 2019

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

92S

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04973401

Surface Location

NW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4256776

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open core hole from the bottom of the core hole to the top of the core hole. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated intervals, as necessary.

If the hole has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the core hole.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

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API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

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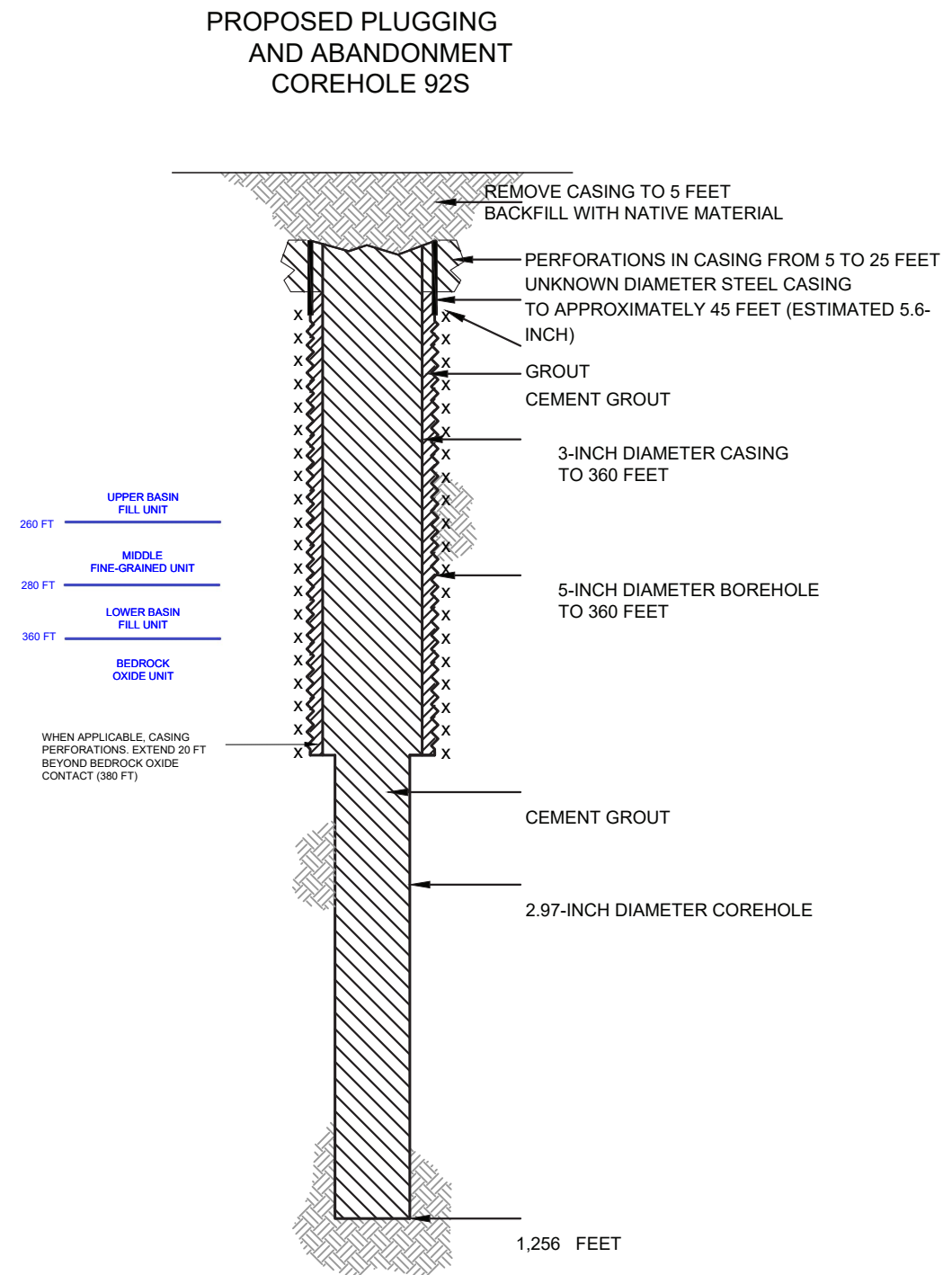
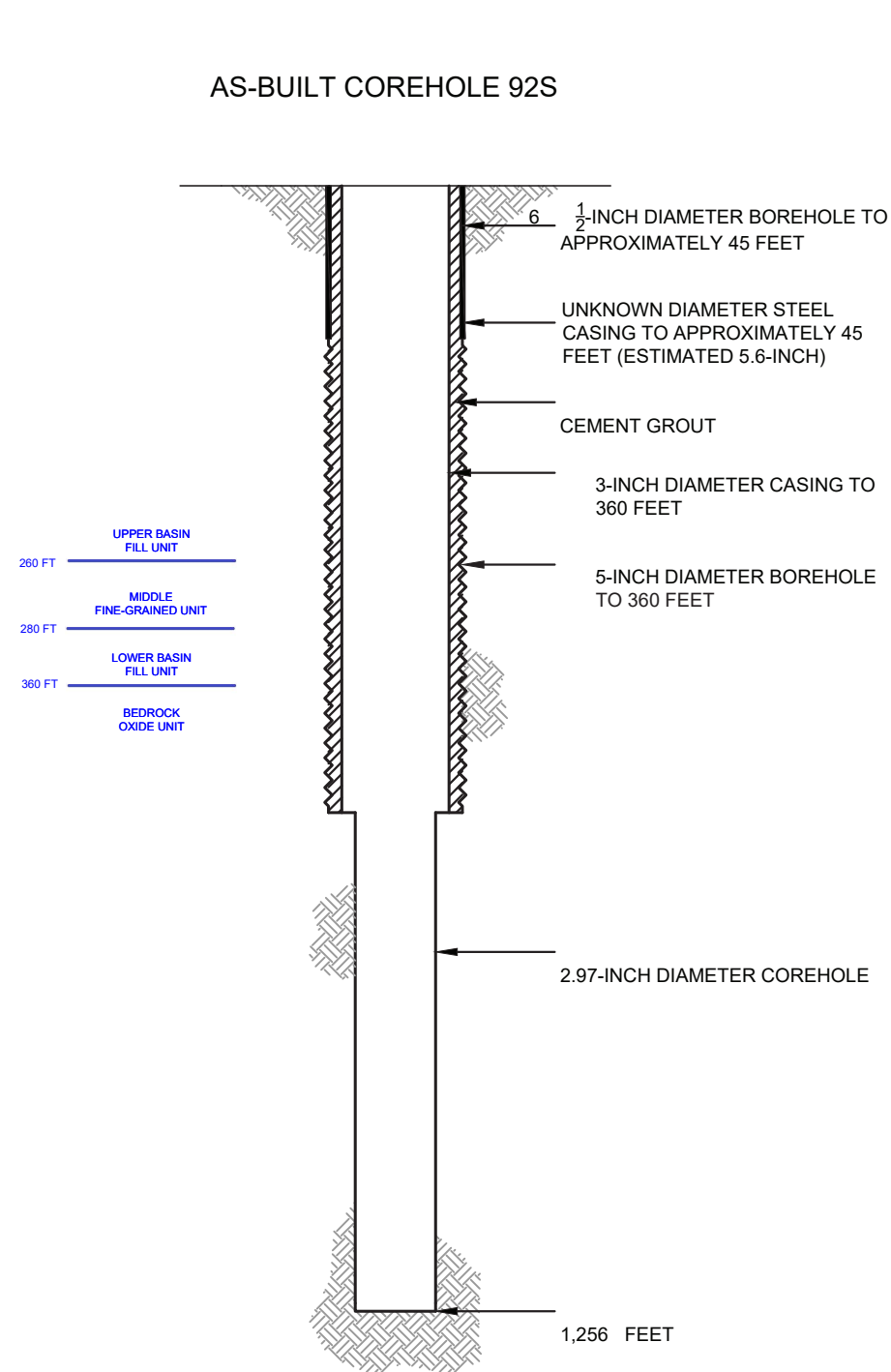
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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 92S DIAGRAM



NOT TO SCALE
SEPTEMBER 2019

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

92SA

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.0499978

Surface Location

NW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4257992

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

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10/3/2019

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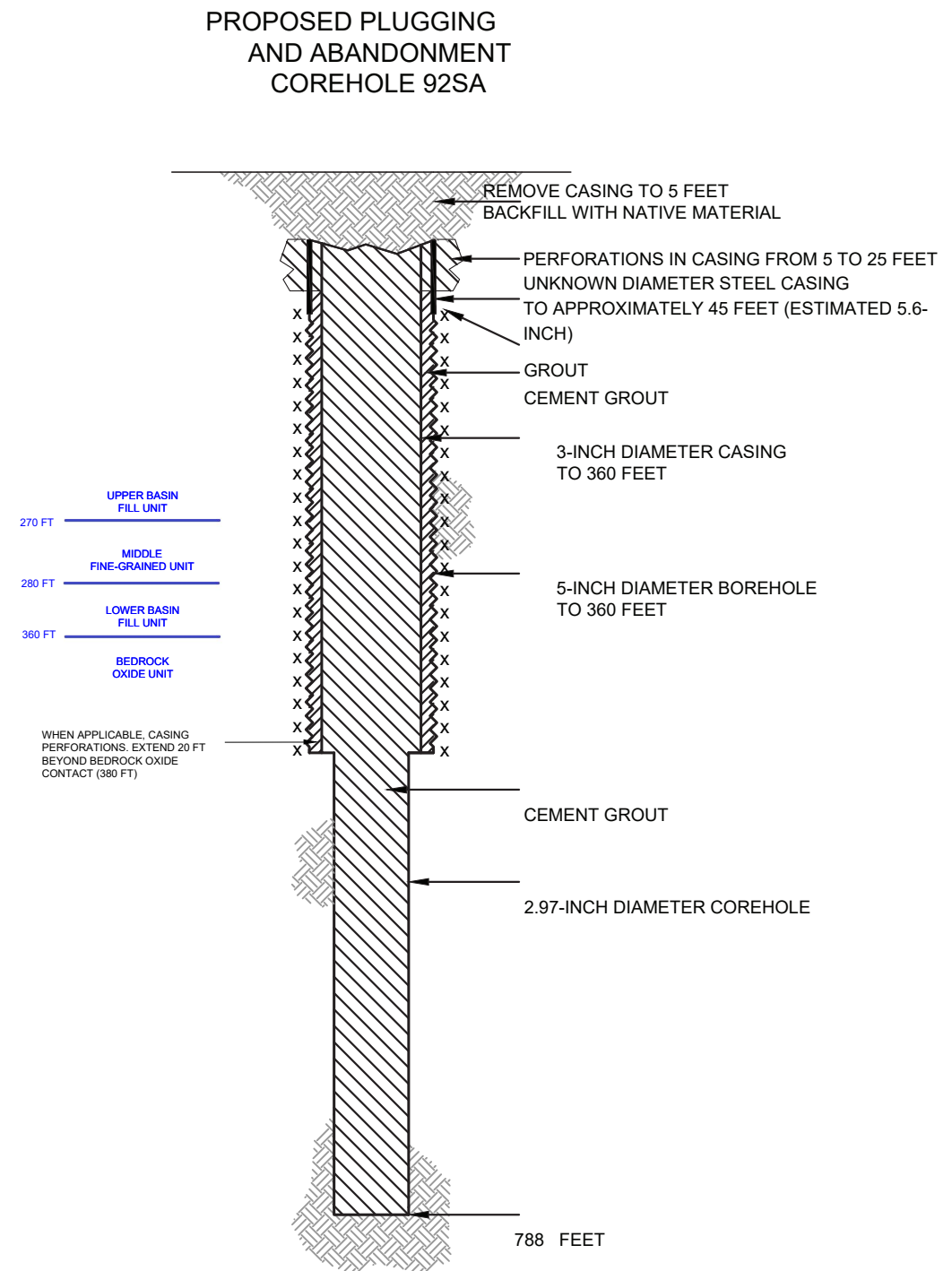
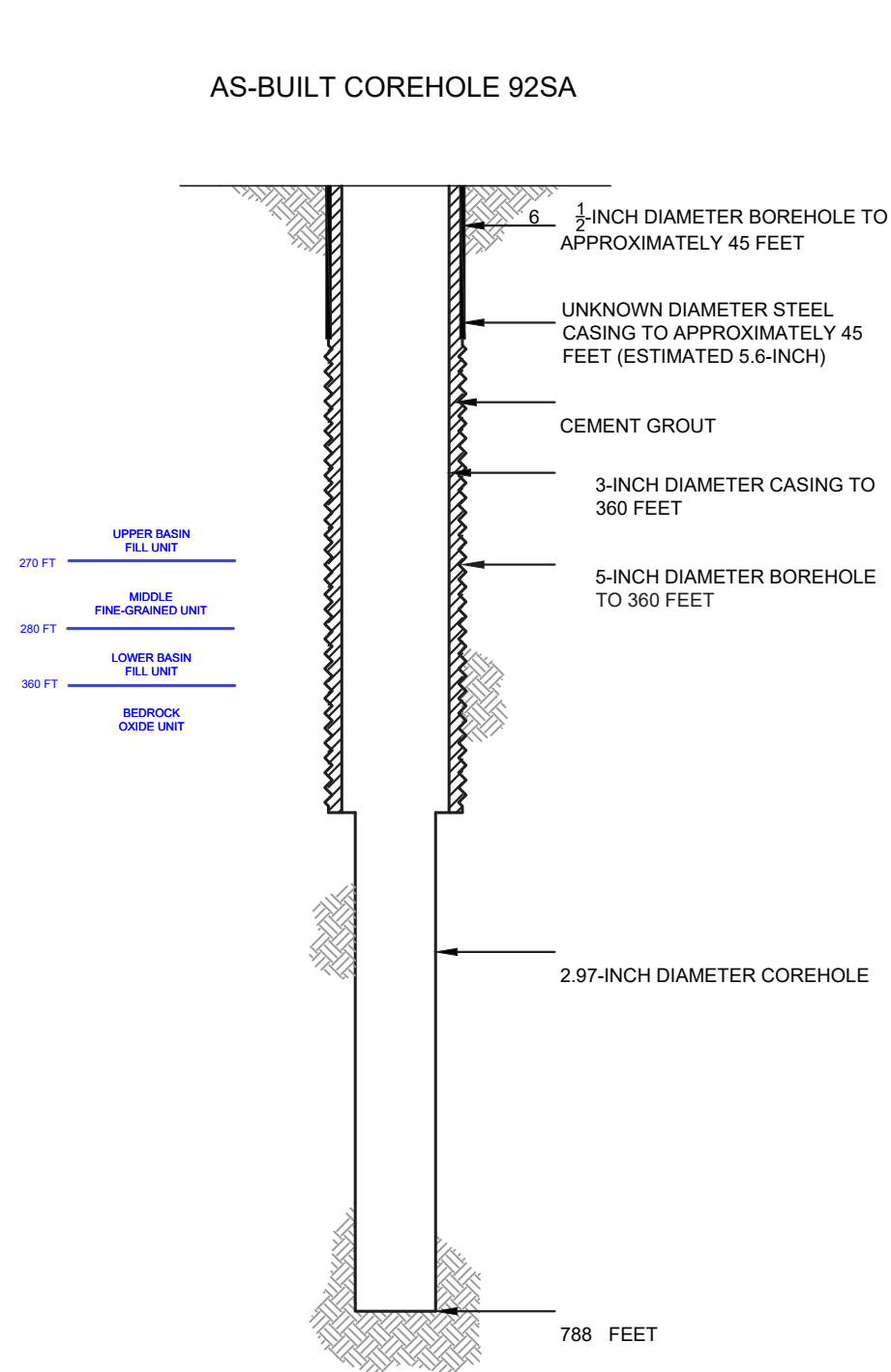
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United States Environmental Protection Agency



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Full Well Name

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State

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Latitude 33.04973957

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ft. from (N/S) Line of quarter section

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Type of Action (pick one)

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For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

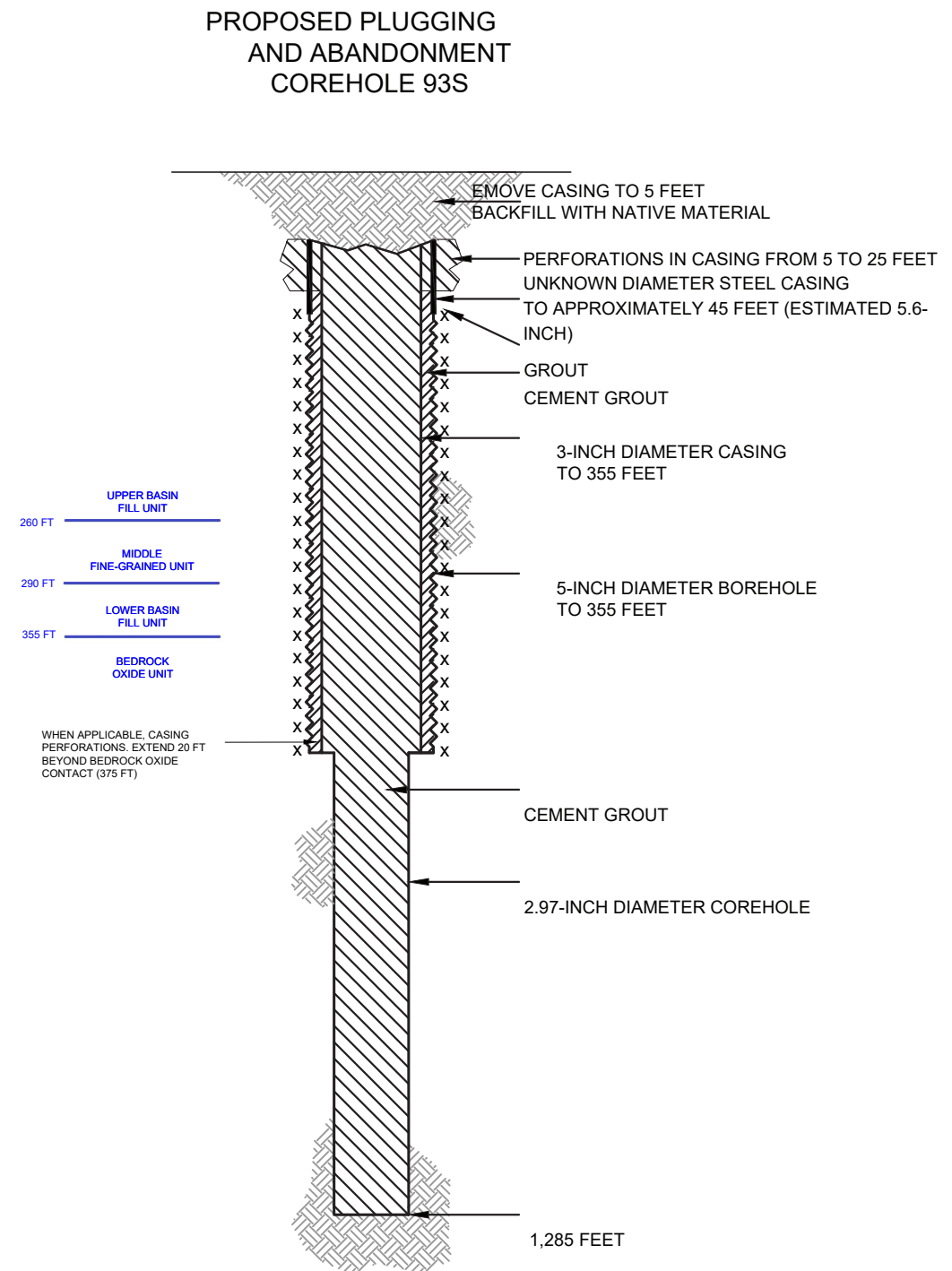
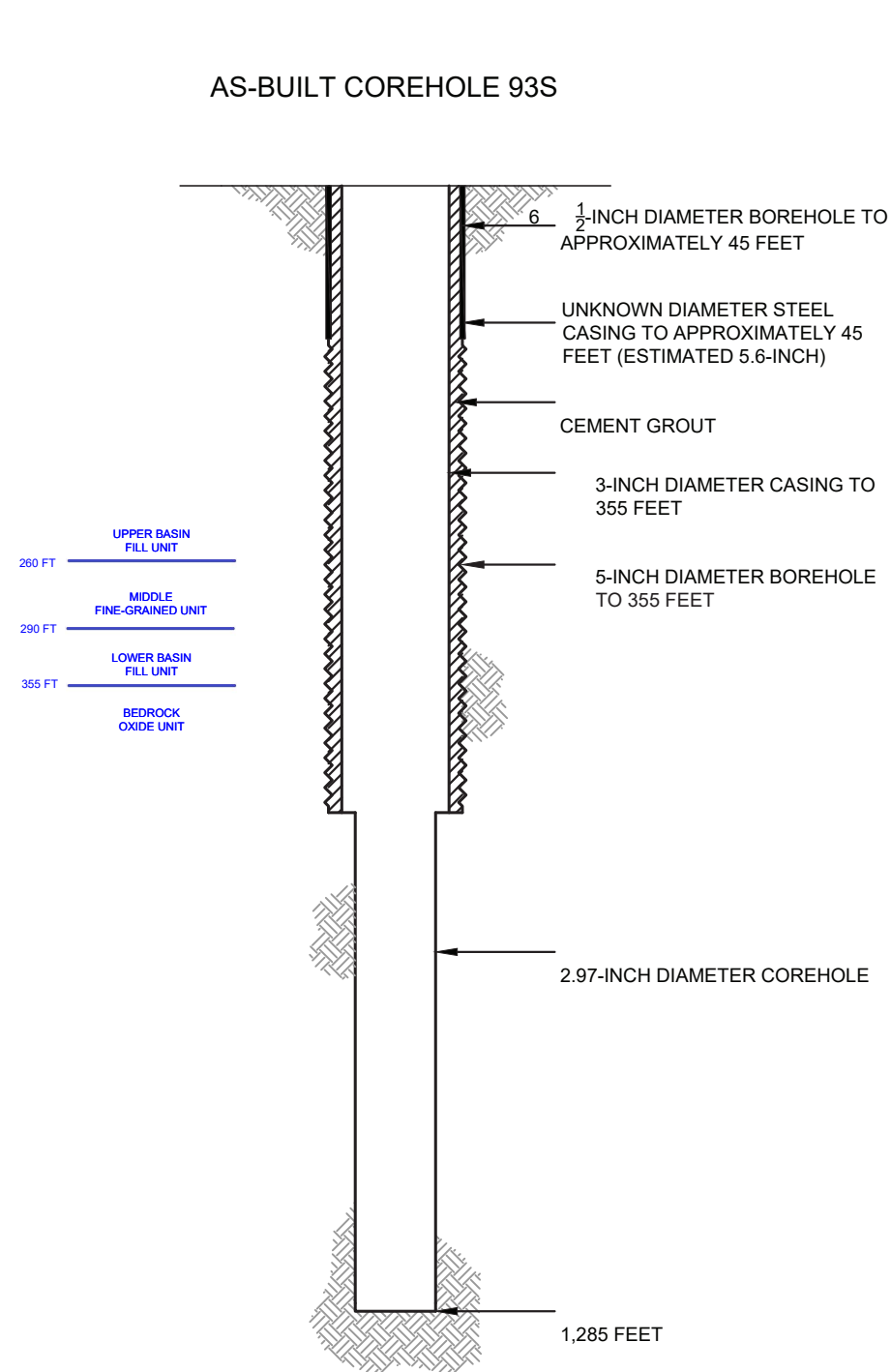
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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

96S

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05229753

Surface Location

NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.433817

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
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Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open core hole from the bottom of the core hole to the top of the core hole. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated intervals, as necessary.

If the hole has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the core hole.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

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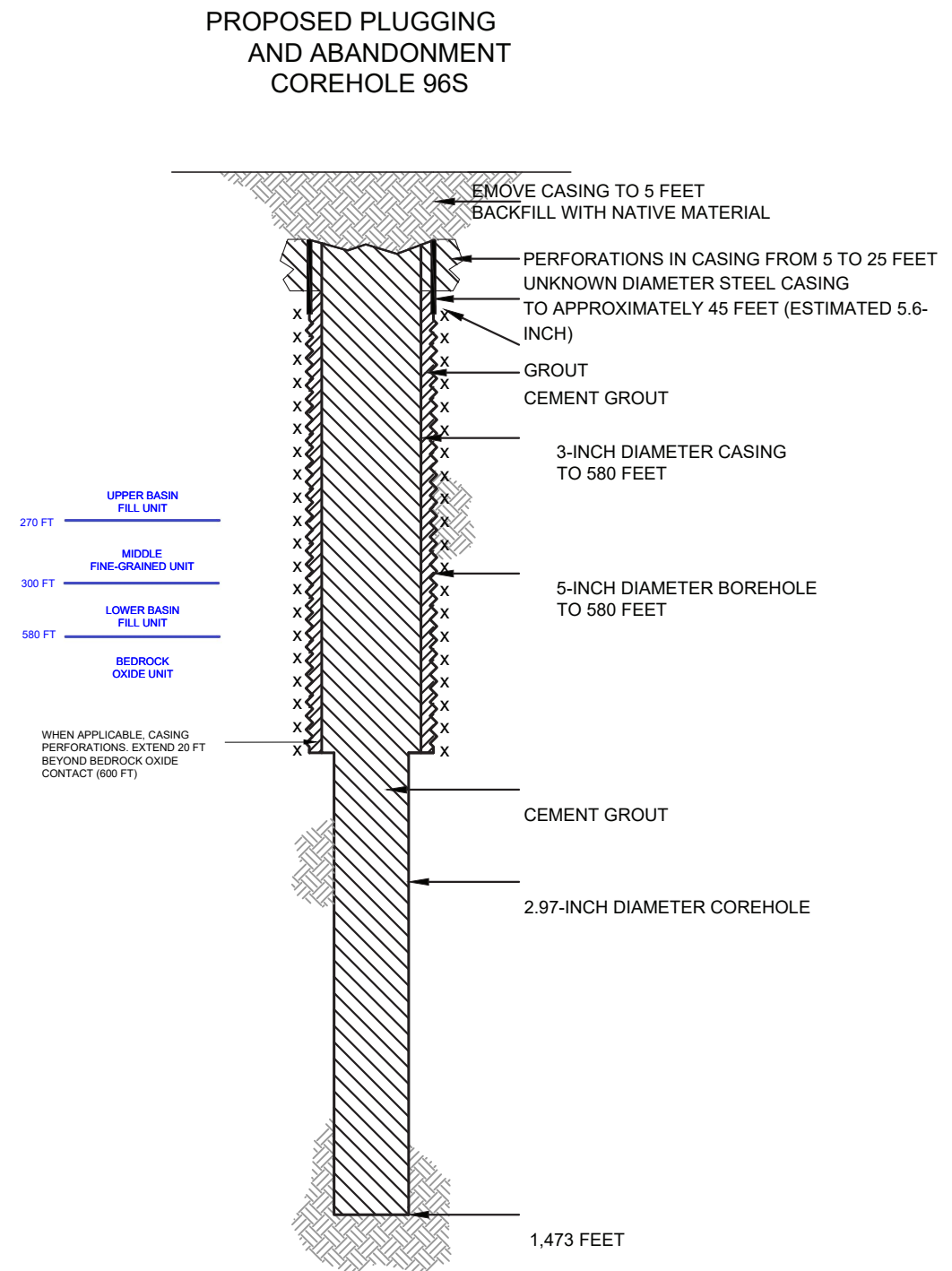
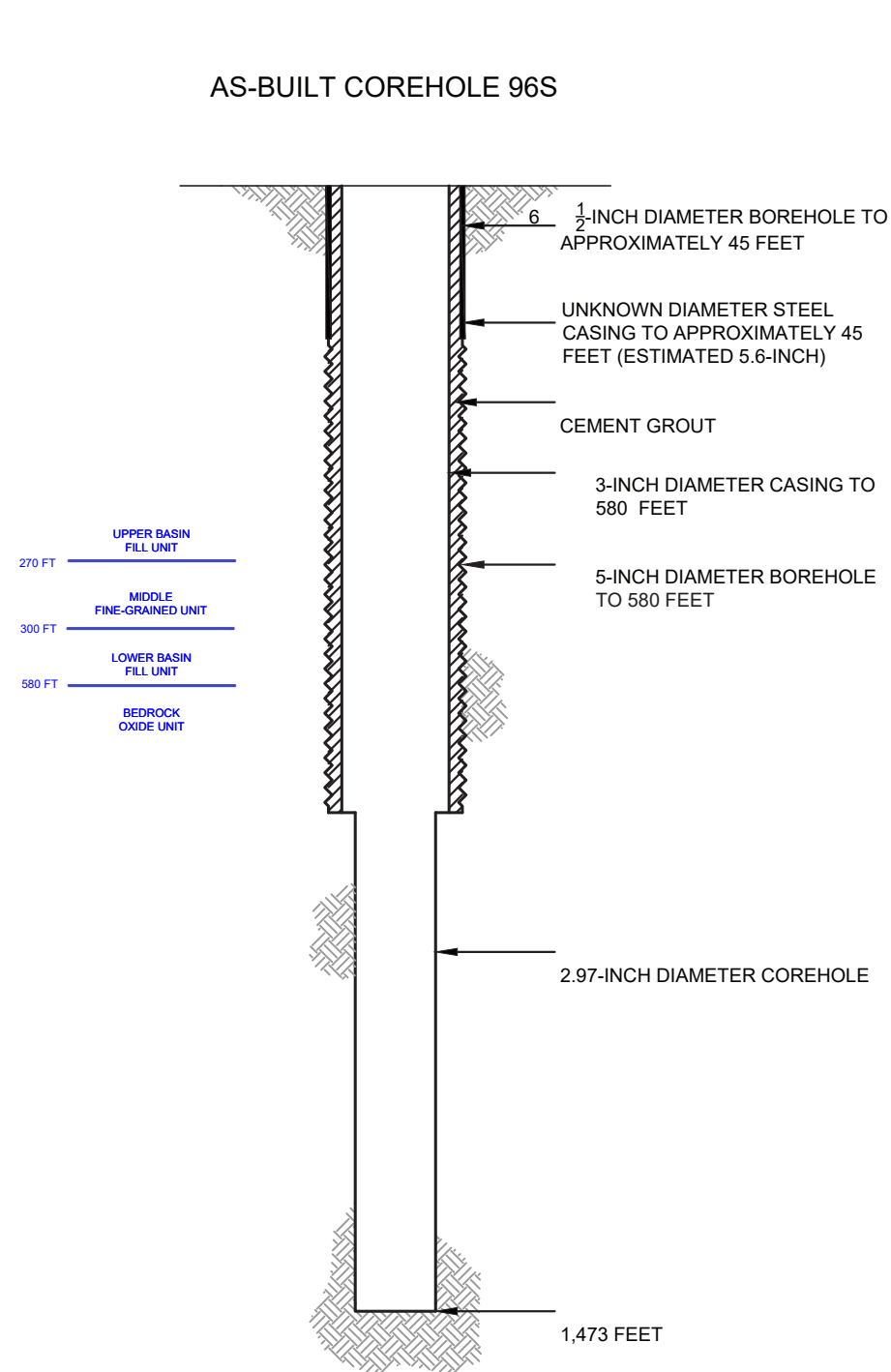
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Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

97MF

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04381752

Surface Location

NE 1/4 of NW 1/4 of Section 33 Township 4S Range 9E

Longitude -111.4330419

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

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Date Expected to Commence March 2021

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10/3/2019

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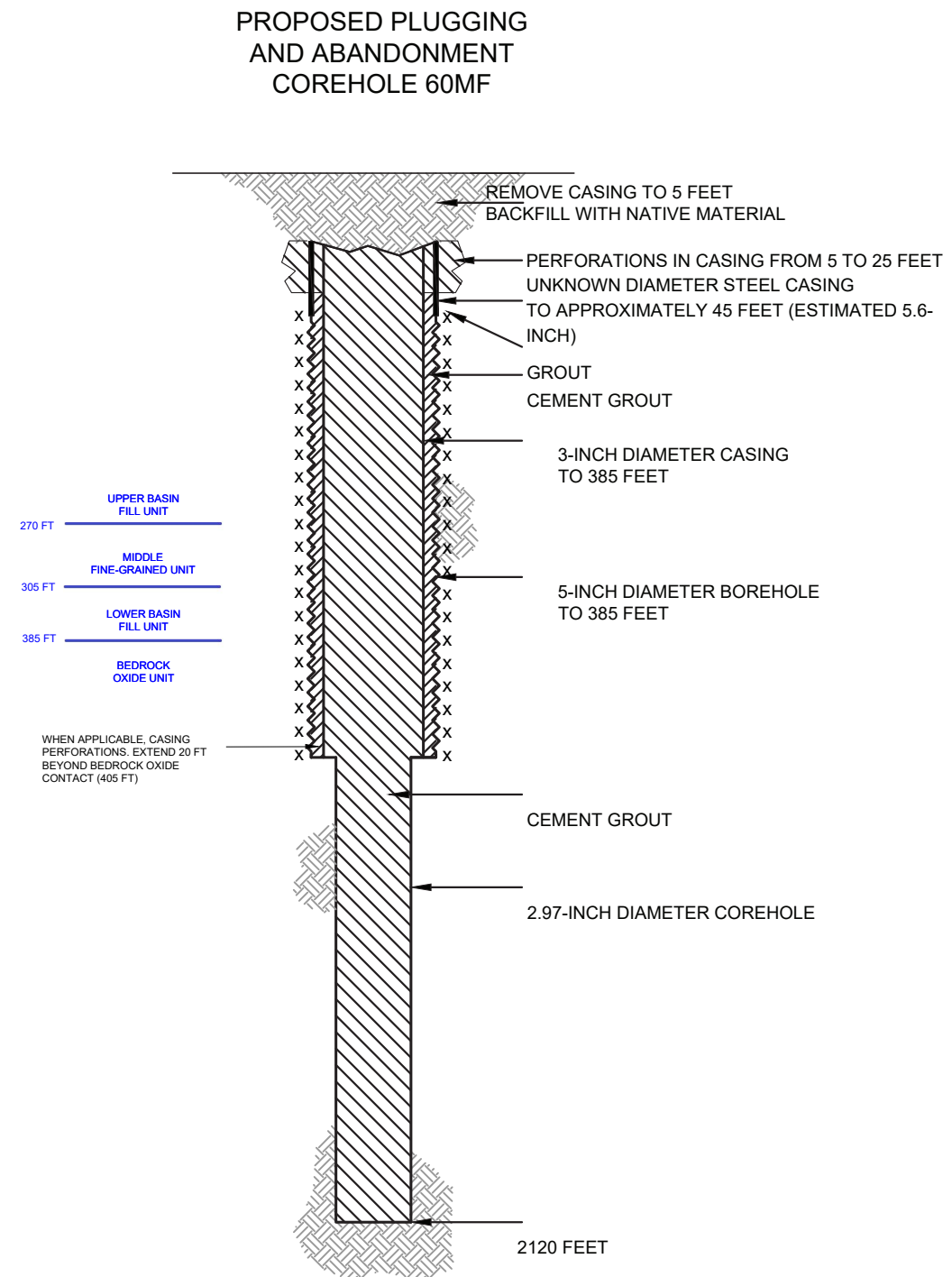
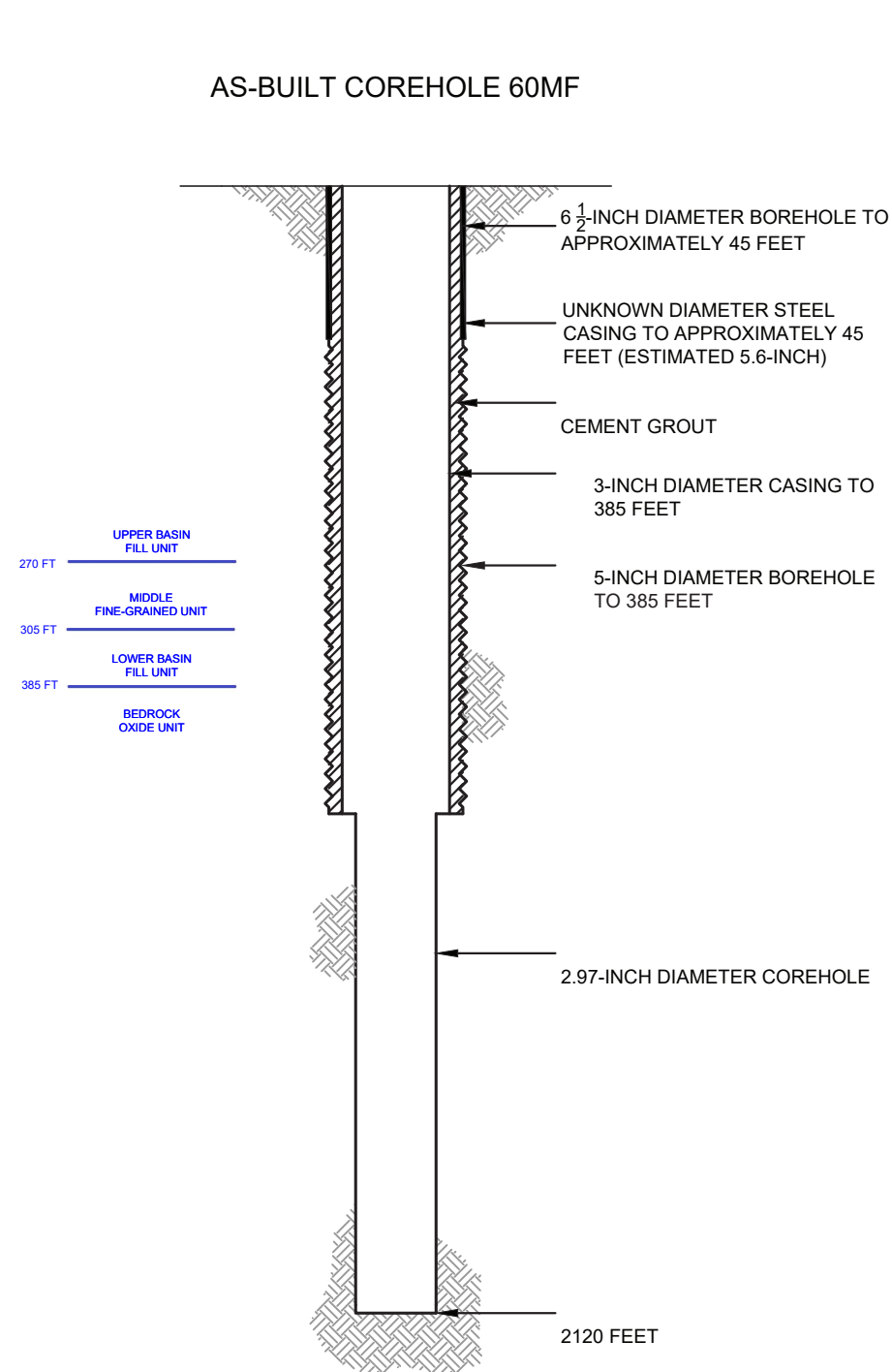
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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 60MF DIAGRAM



NOT TO SCALE
SEPTEMBER 2019

United States Environmental Protection Agency



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Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
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Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

100MF

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04500394

Surface Location

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Longitude -111.4322209

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

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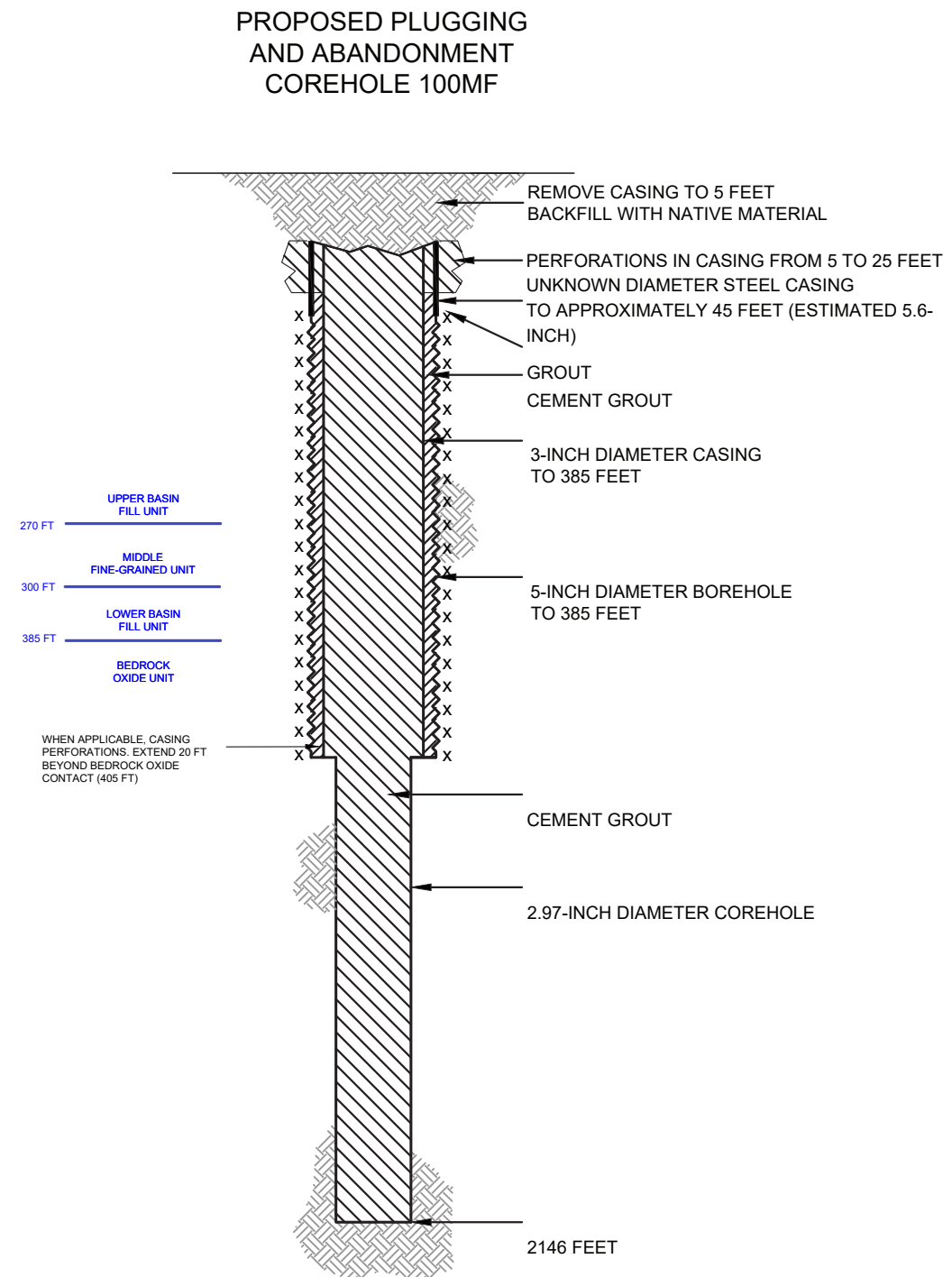
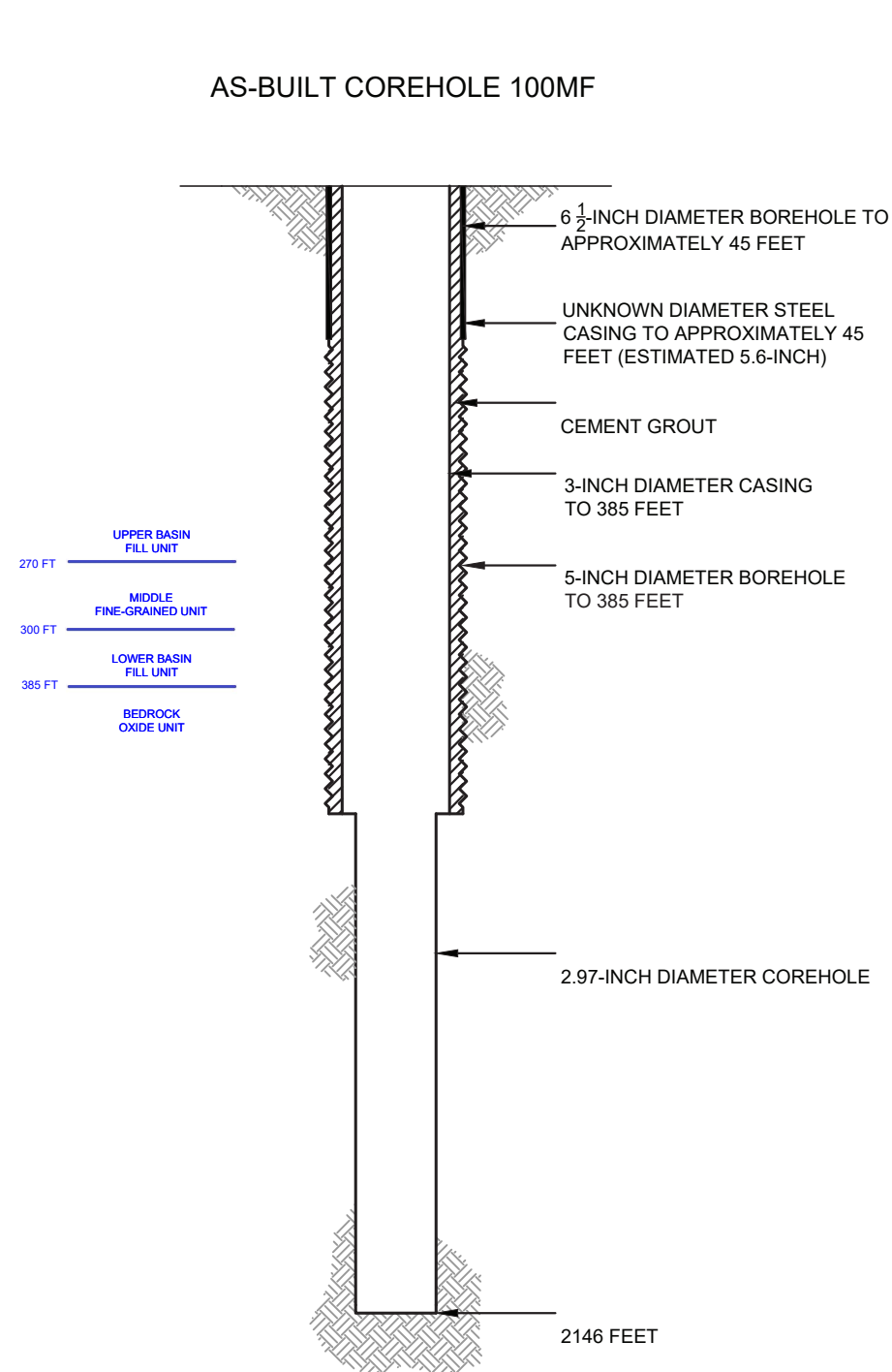
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

PAPERWORK REDUCTION ACT NOTICE: The public reporting and recordkeeping burden for this collection of information is estimated to average between 6.0 and 7.9 hours per response, depending on the injection well class. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.



FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 100MF DIAGRAM



NOT TO SCALE
SEPTEMBER 2019

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

105MF

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04856067

Surface Location

SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4297554

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open core hole from the bottom of the core hole to the top of the core hole. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated intervals, as necessary.

If the hole has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the core hole.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

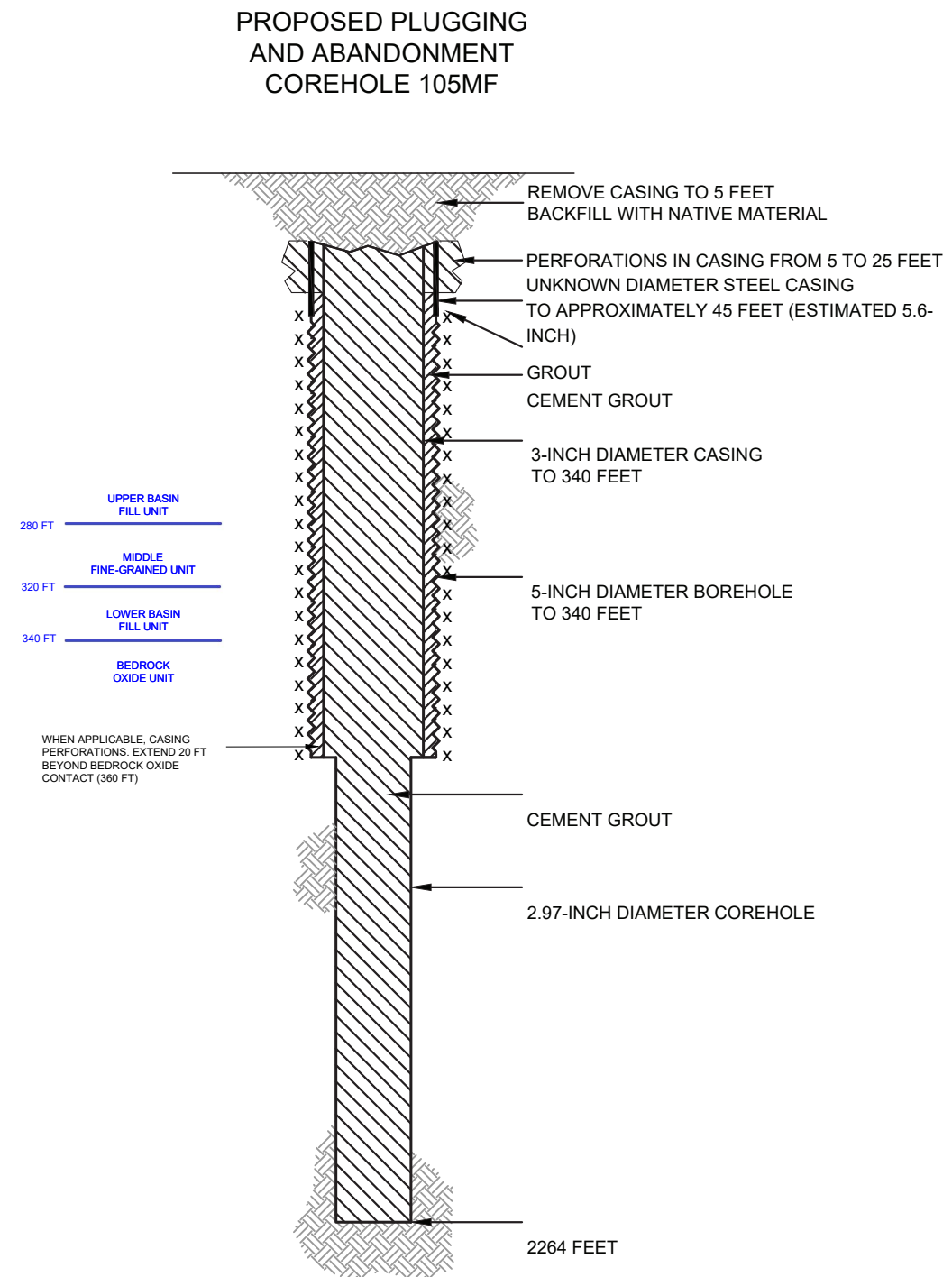
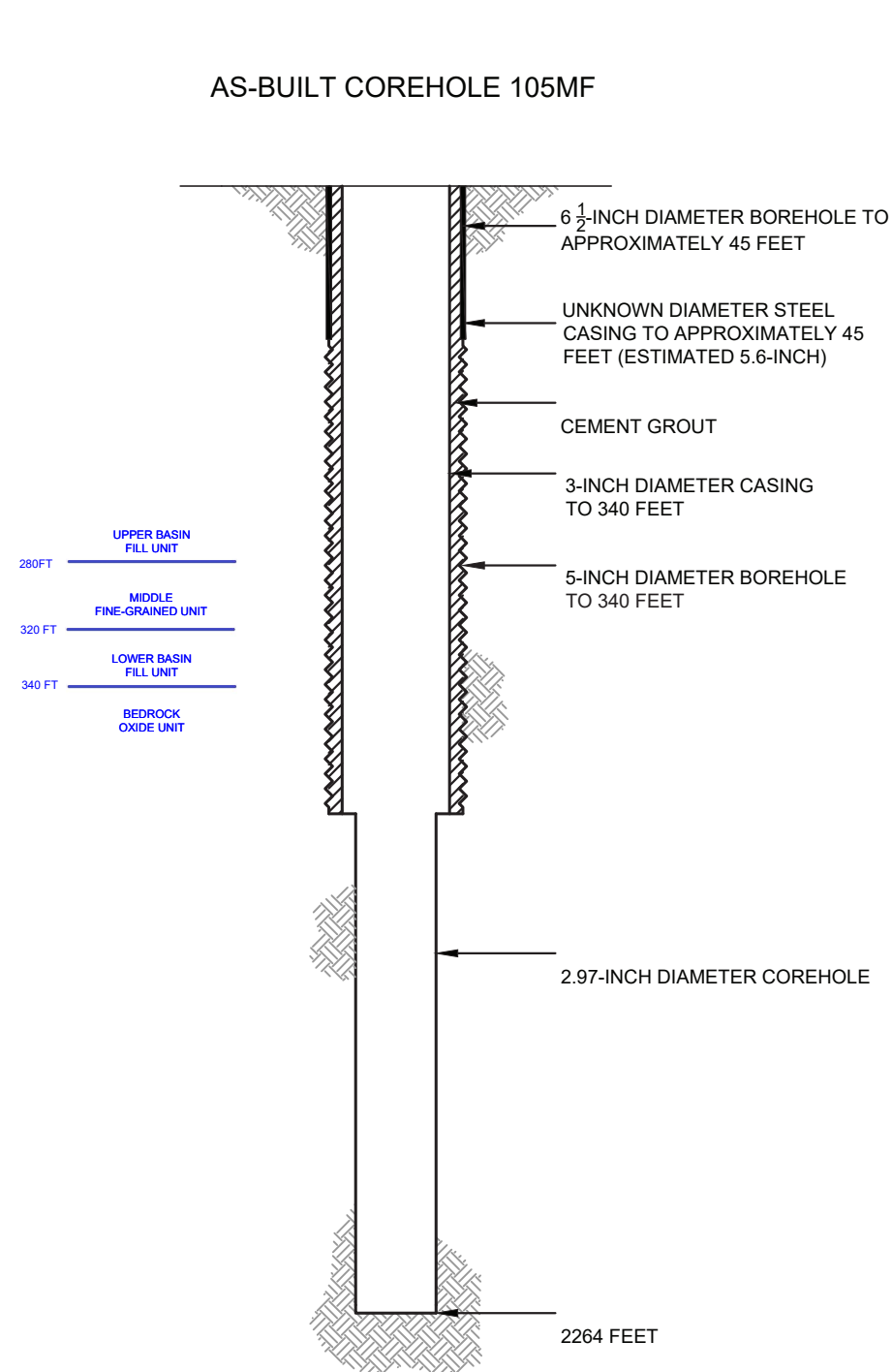
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**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 105MF DIAGRAM

**FLORENCE
COPPER INC.**

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

106MF

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04618096

Surface Location

SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.429767182

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

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A tremie pipe will be used to place Type V cement in the open core hole from the bottom of the core hole to the top of the core hole. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated intervals, as necessary.

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I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

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Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

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Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

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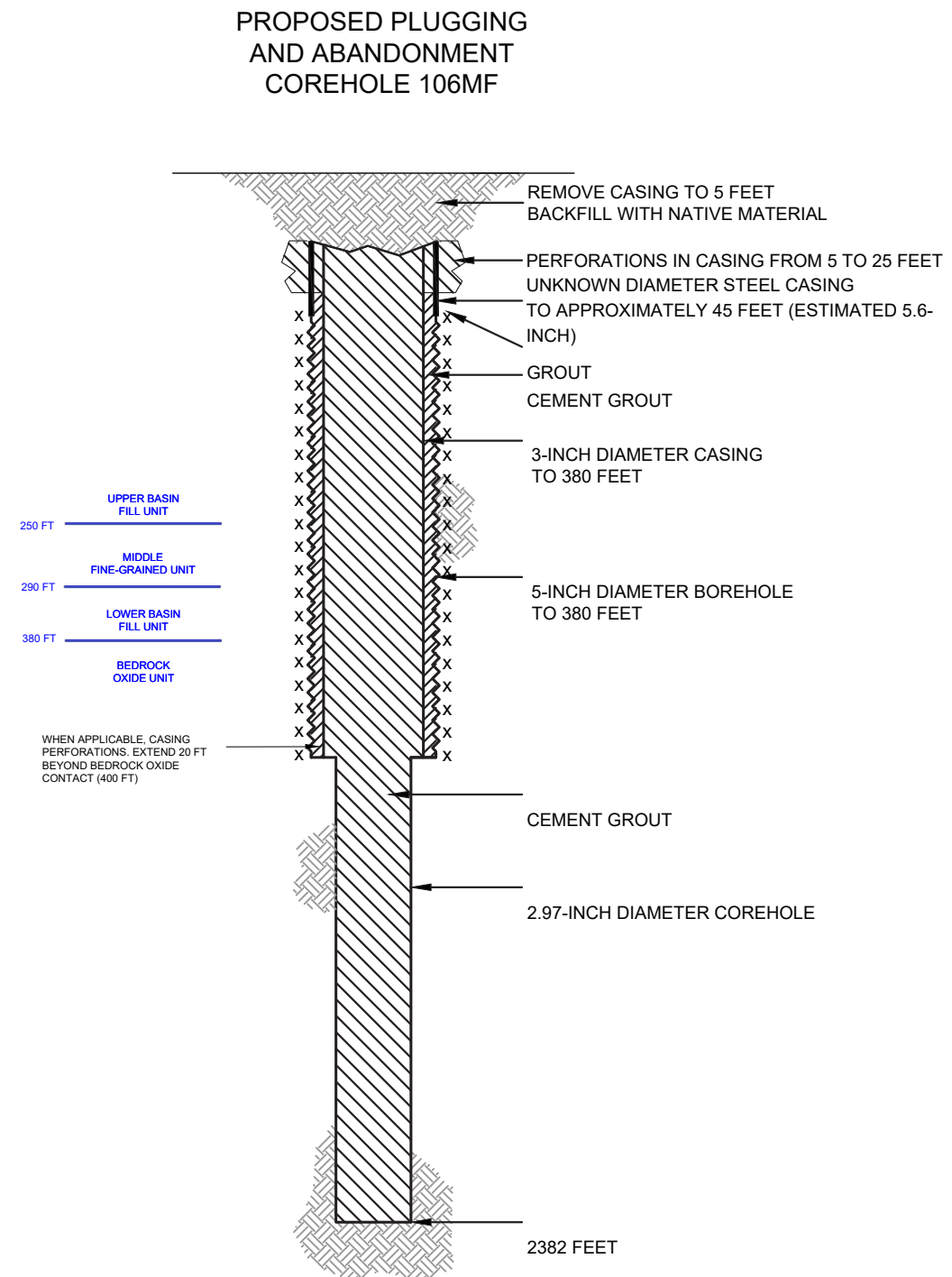
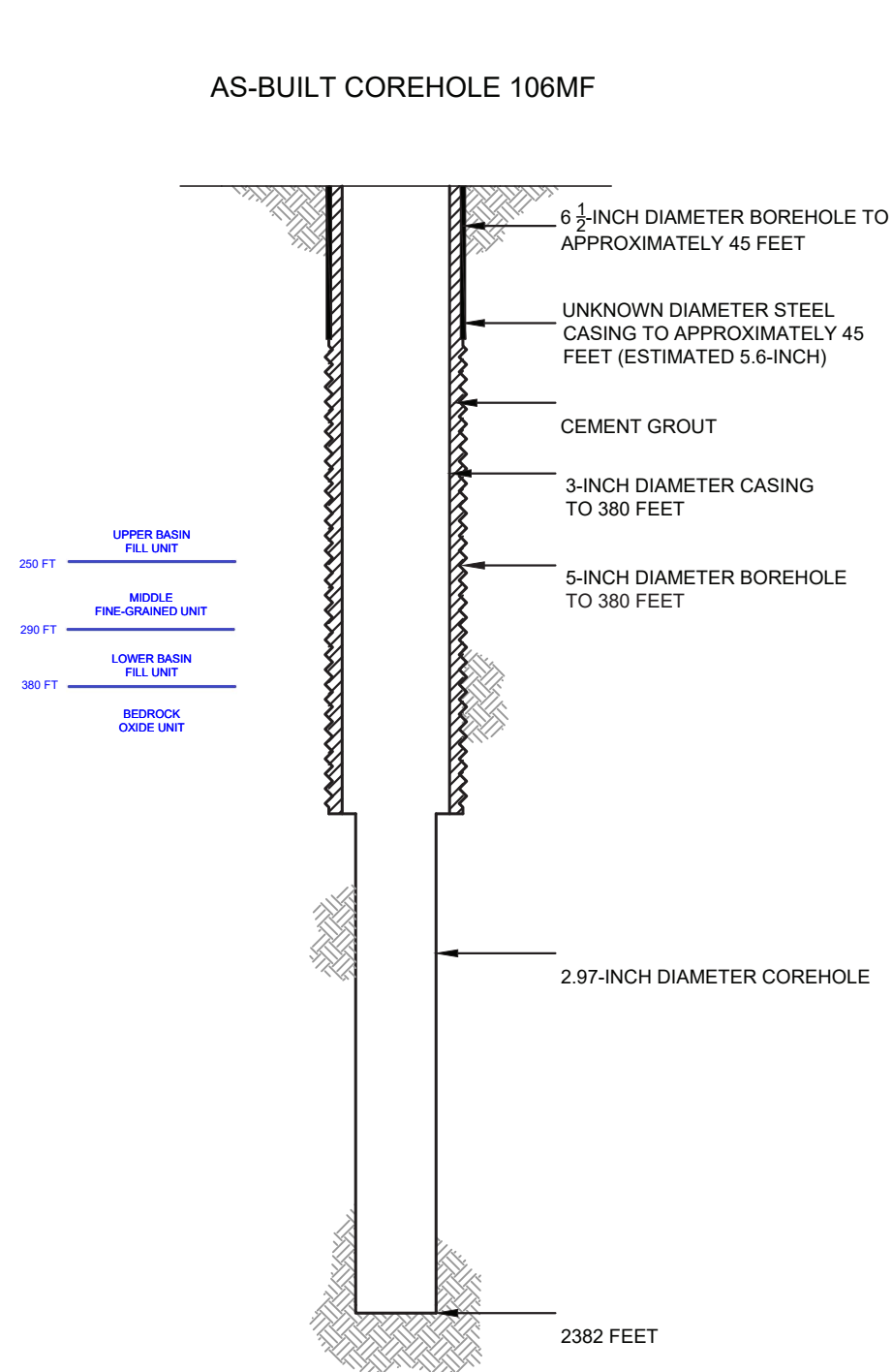
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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 106MF DIAGRAM



NOT TO SCALE
SEPTEMBER 2019

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

107MF

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04498214

Surface Location

NW 1/4 of NE 1/4 of Section 33 Township 4S Range 9E

Longitude -111.4289553

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
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10/3/2019

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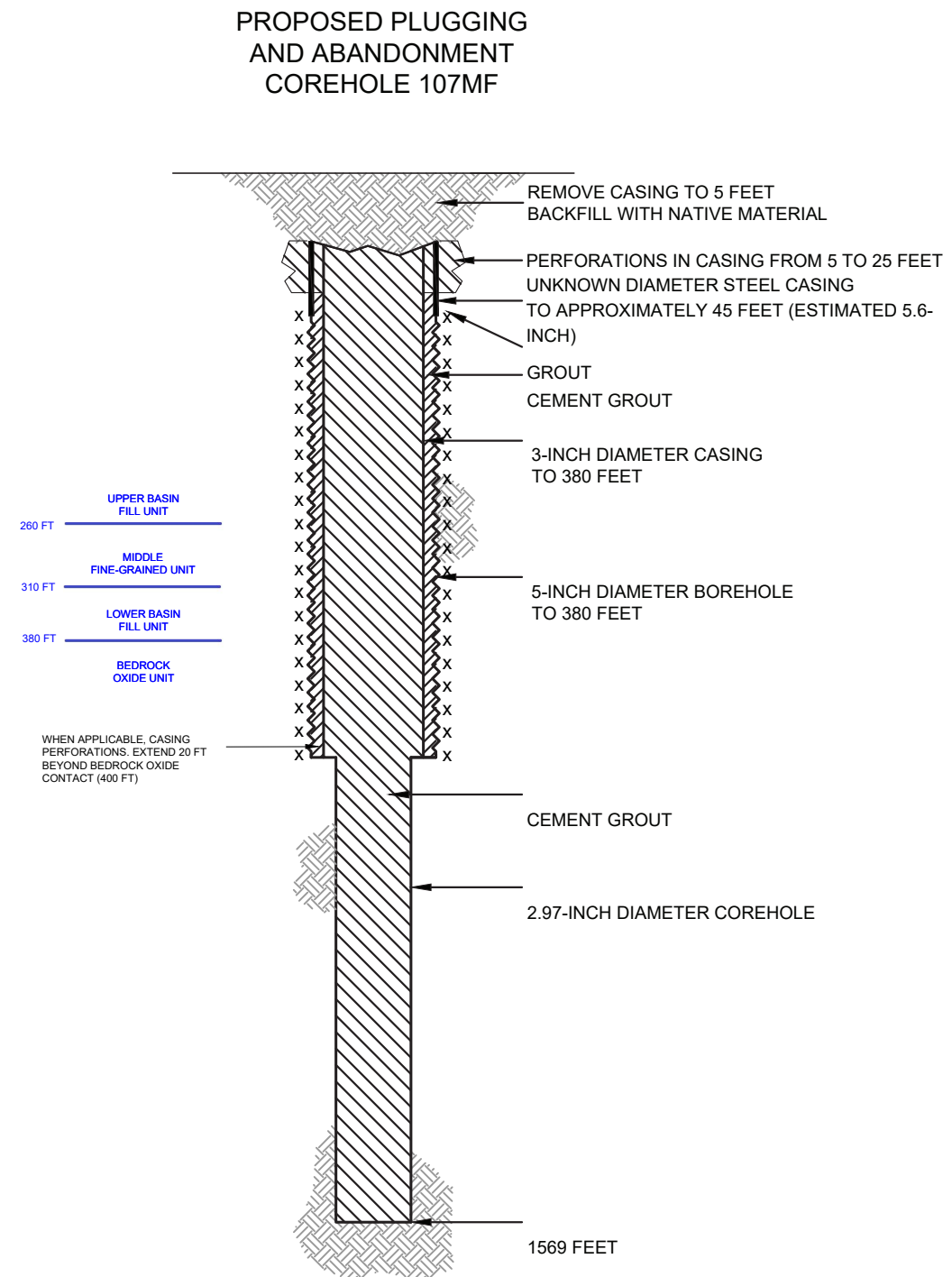
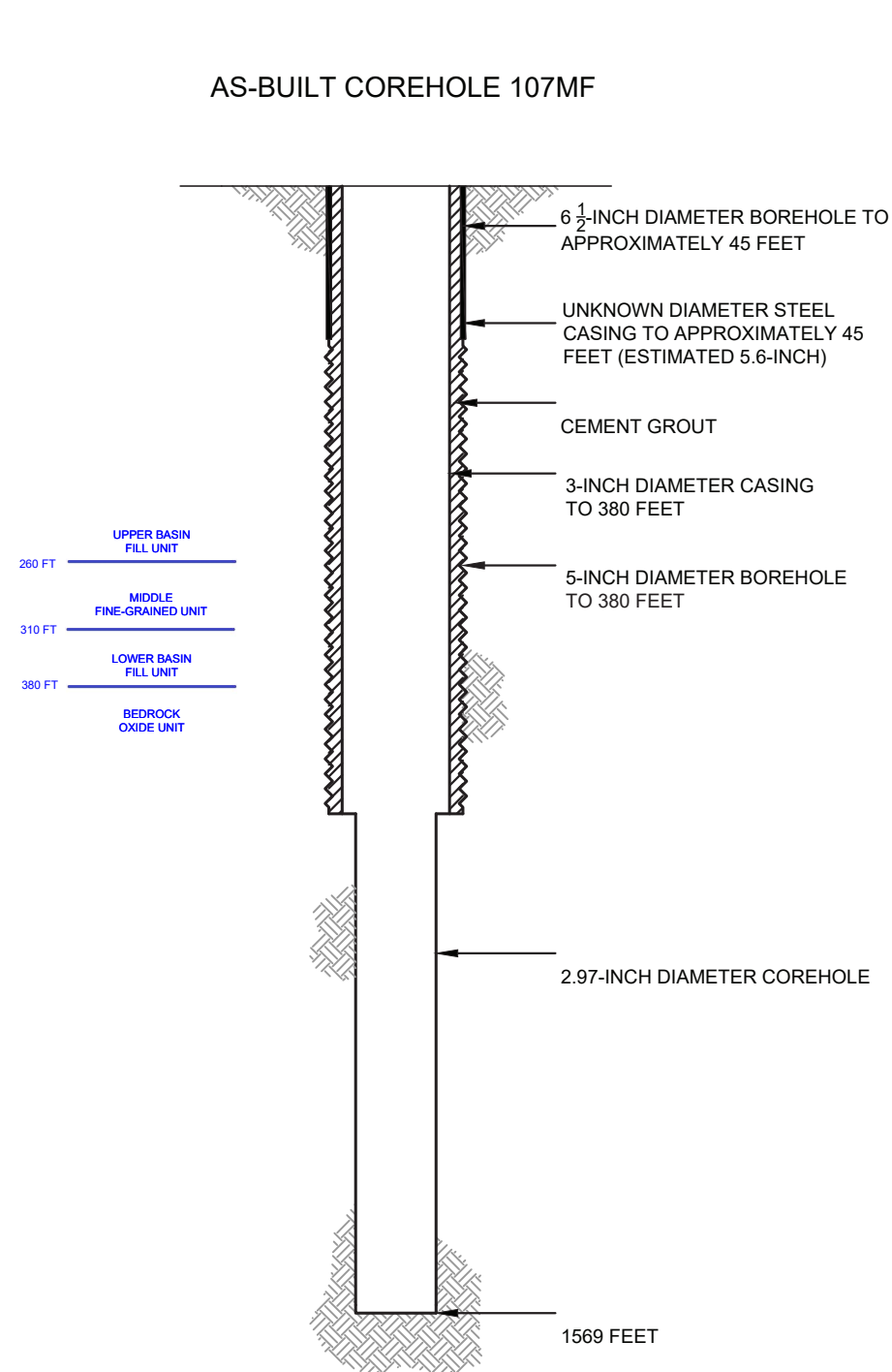
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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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**HALEY
ALDRICH**

FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 107MF DIAGRAM

**FLORENCE
COPPER INC.**

NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

108MF

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04736087

Surface Location

SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4273604

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open core hole from the bottom of the core hole to the top of the core hole. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated intervals, as necessary.

If the hole has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the core hole.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

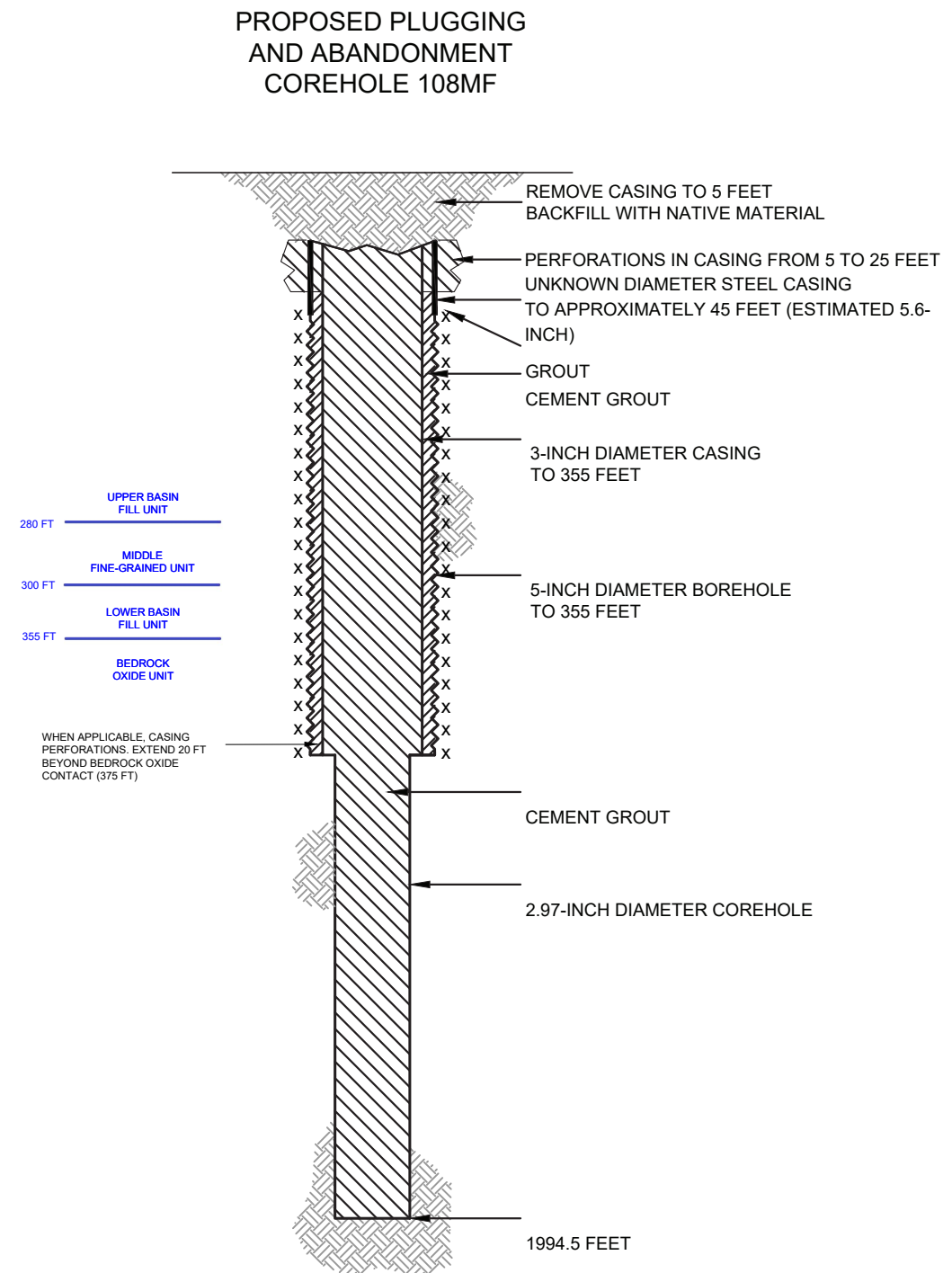
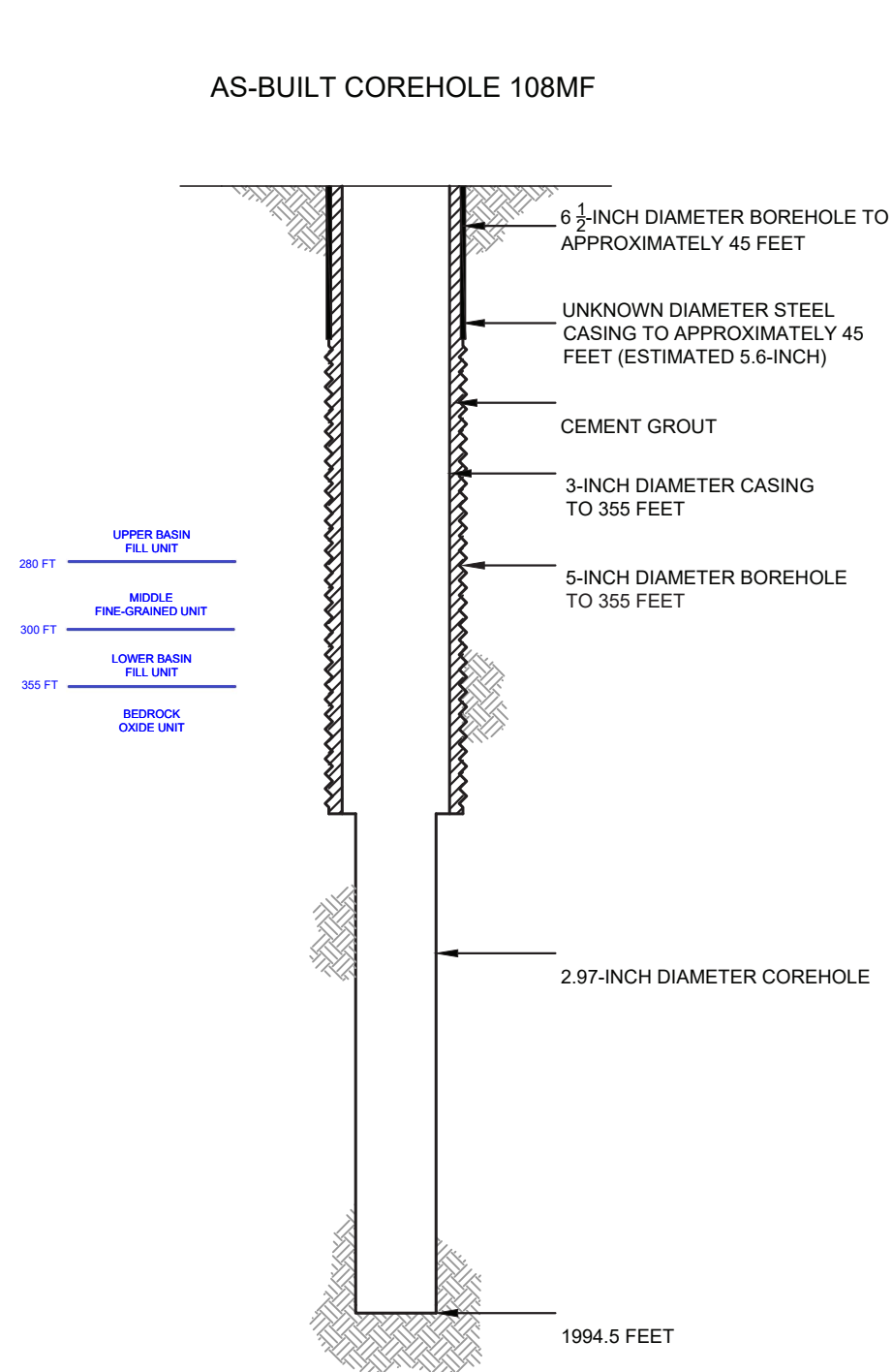
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United States Environmental Protection Agency



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Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

109MF

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04501543

Surface Location

NW 1/4 of NW 1/4 of Section 33 Township 4S Range 9E

Longitude -111.4354754

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

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Date Work Ended

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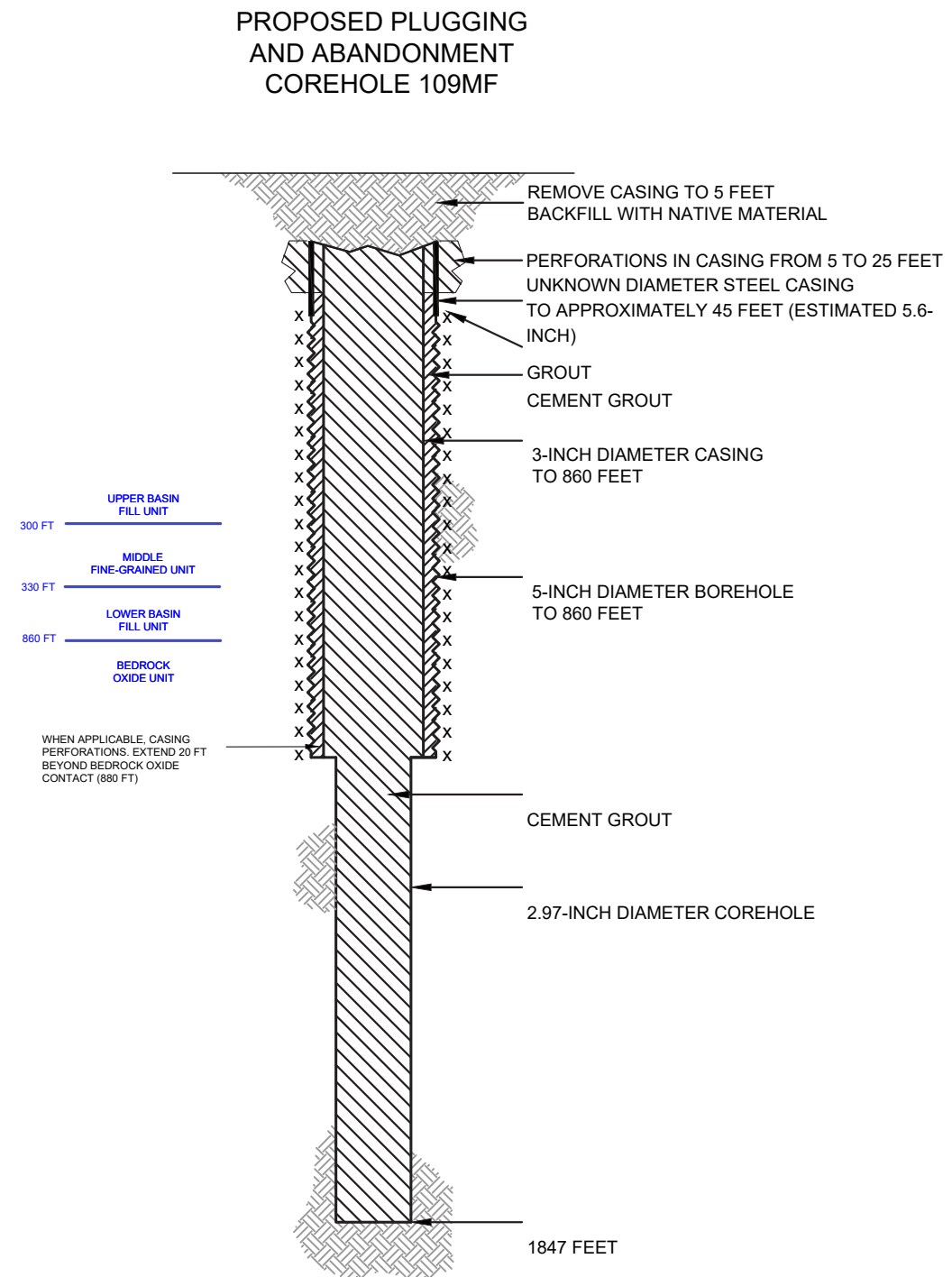
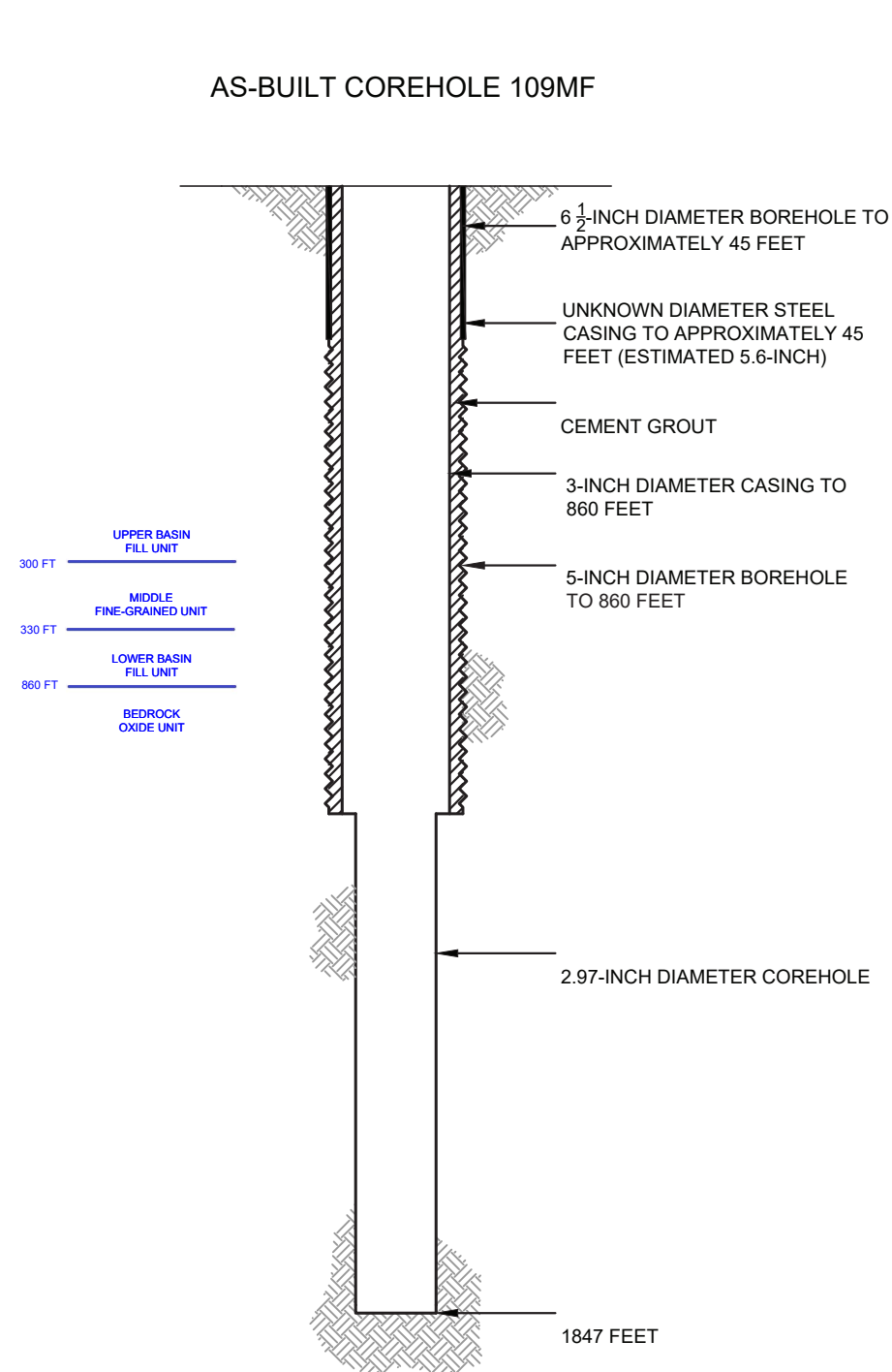
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FLORENCE, ARIZONA

COREHOLE 109MF DIAGRAM

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NOT TO SCALE
SEPTEMBER 2019

FIGURE 1

United States Environmental Protection Agency



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API Number

Full Well Name

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State

Arizona

County

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Latitude 33.05215789

Surface Location

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Longitude -111.4354496

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

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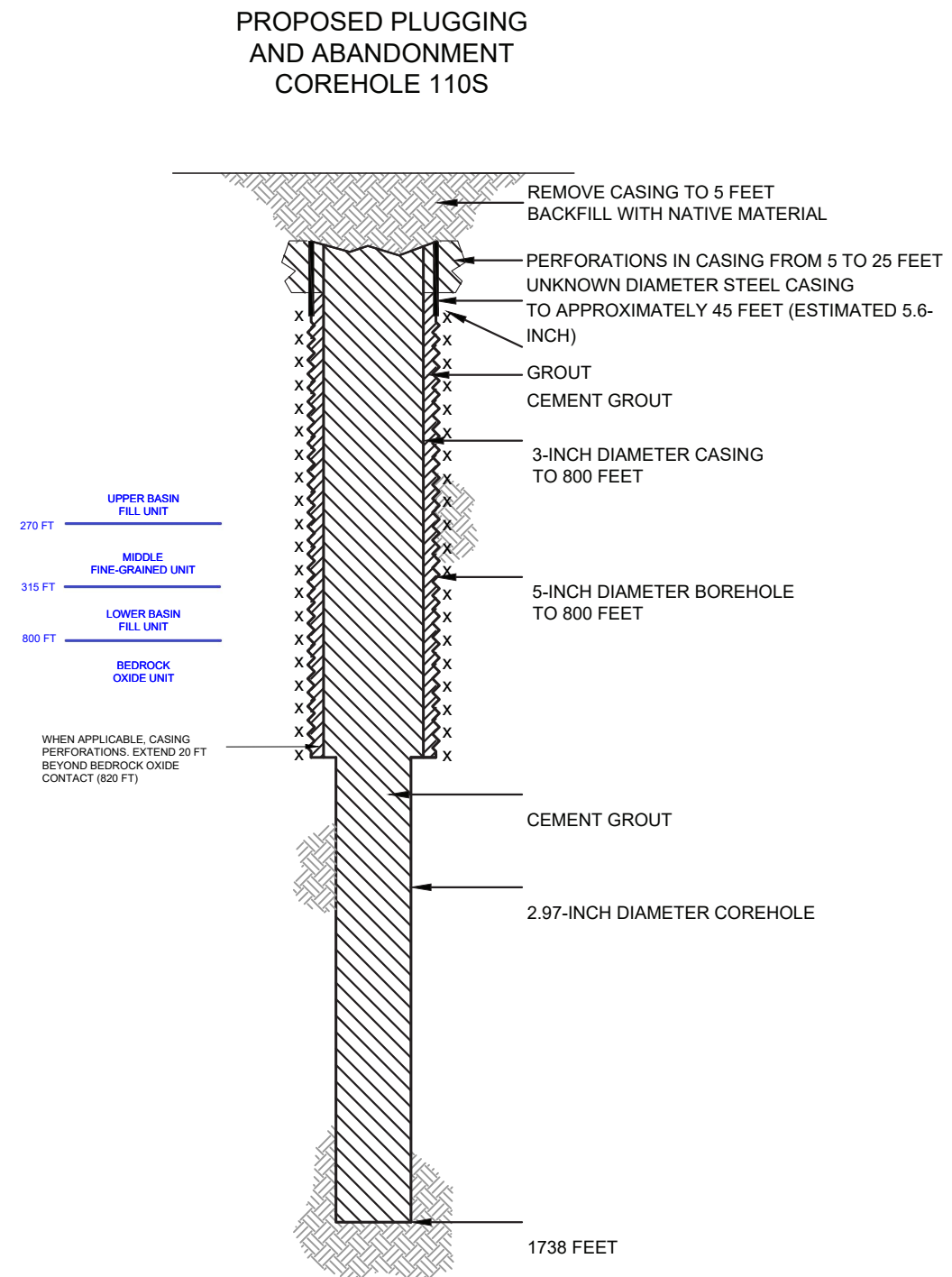
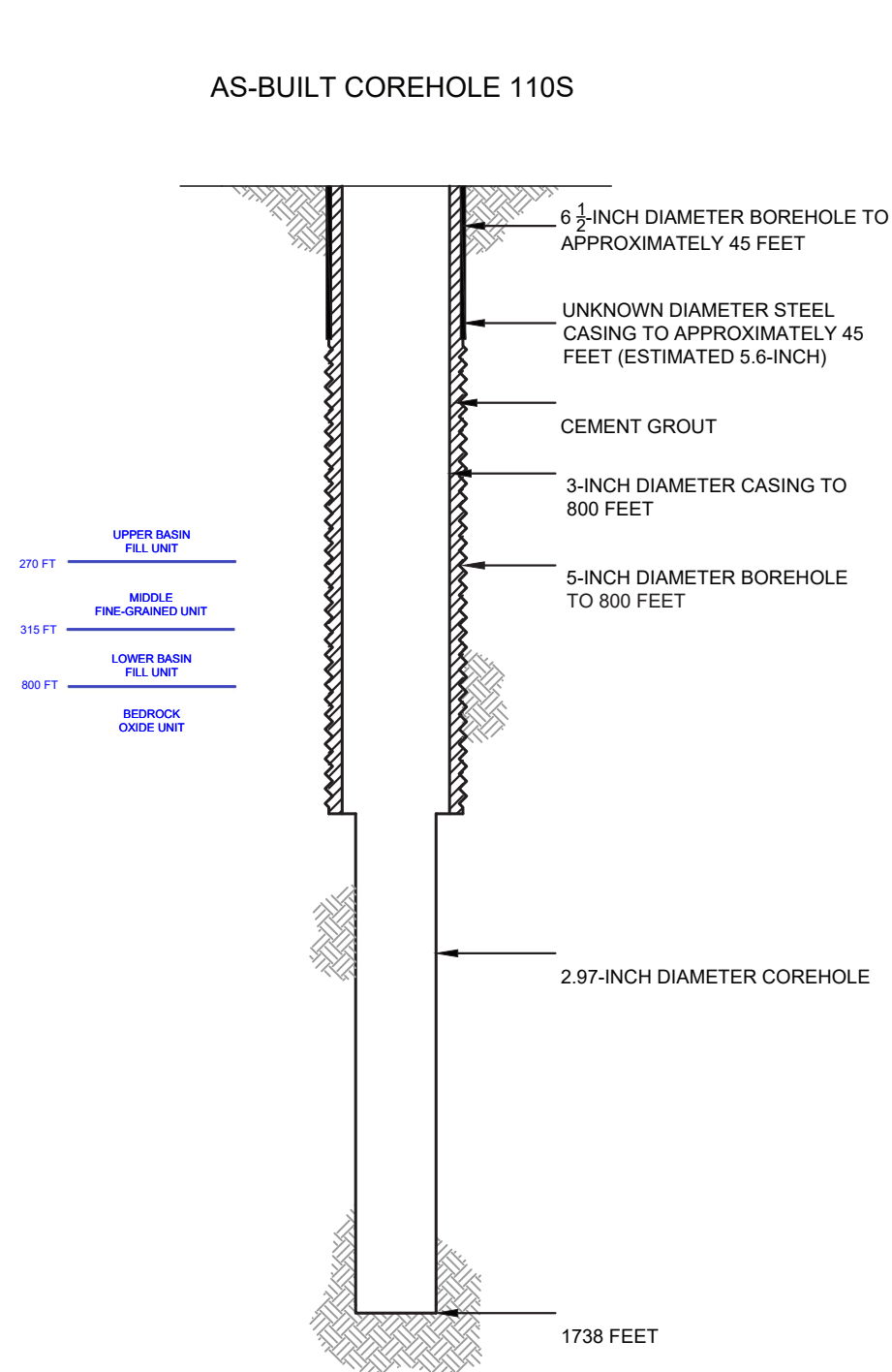
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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

CERTIFICATION: This form must be signed and dated by either: a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, or by a principal executive or ranking elected official for a public agency.

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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 110S DIAGRAM



NOT TO SCALE
SEPTEMBER 2019

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

123MF

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04379962

Surface Location

NW 1/4 of NE 1/4 of Section 33 Township 4S Range 9E

Longitude -111.4297816

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open core hole from the bottom of the core hole to the top of the core hole. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated intervals, as necessary.

If the hole has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the core hole.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

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For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

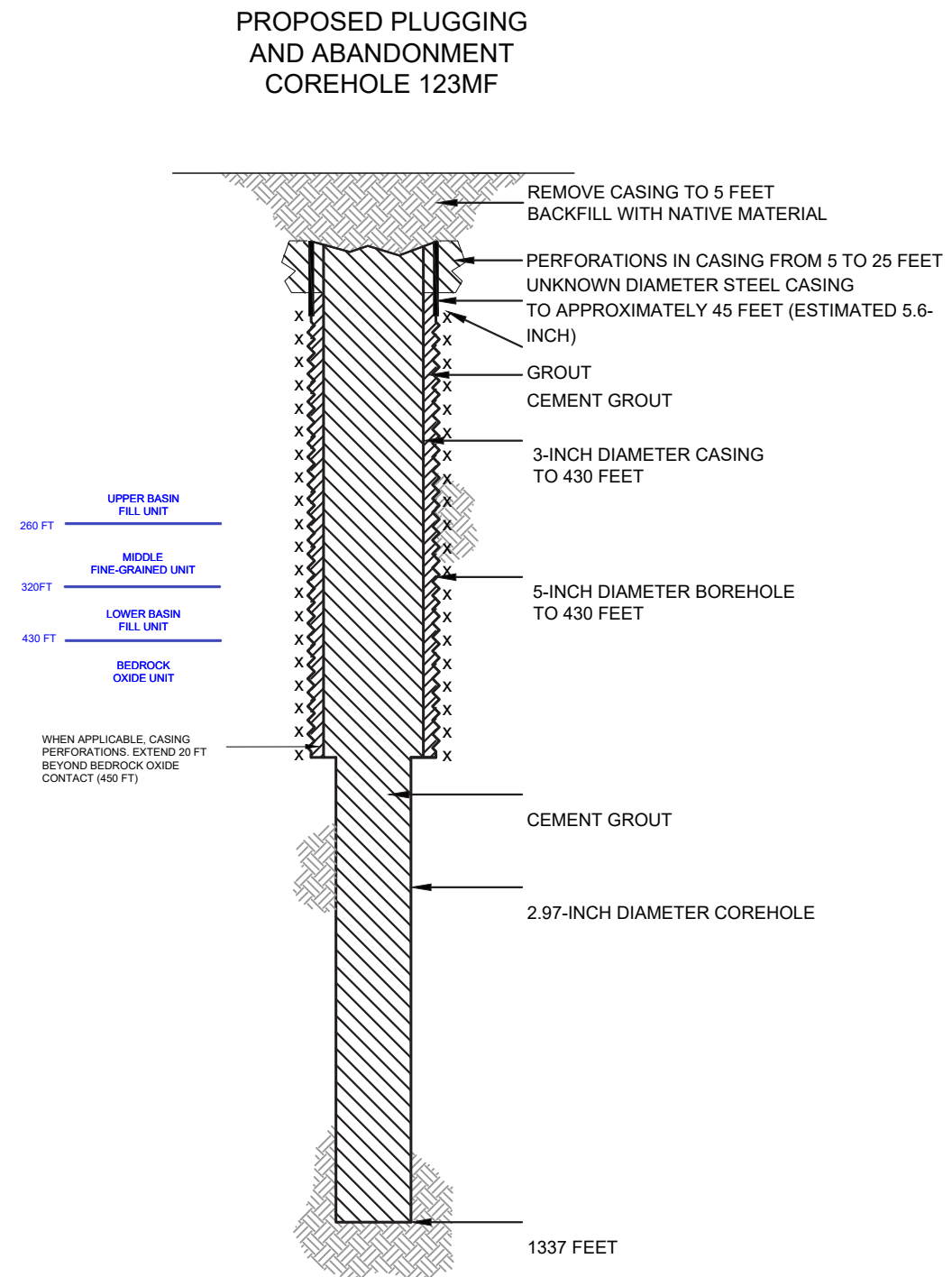
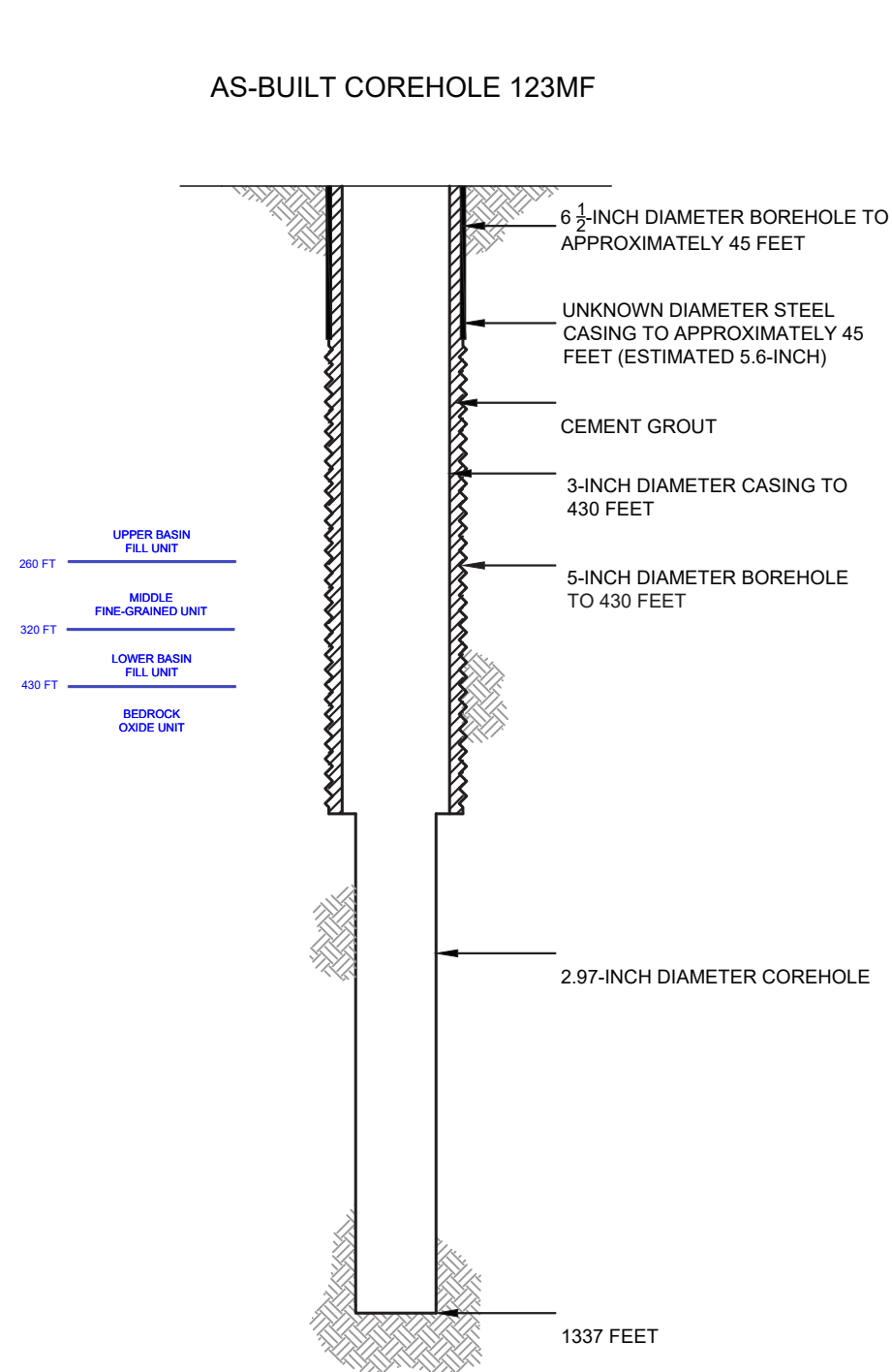
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United States Environmental Protection Agency



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Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

124MF

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04851744

Surface Location

SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4265091

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

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10/3/2019

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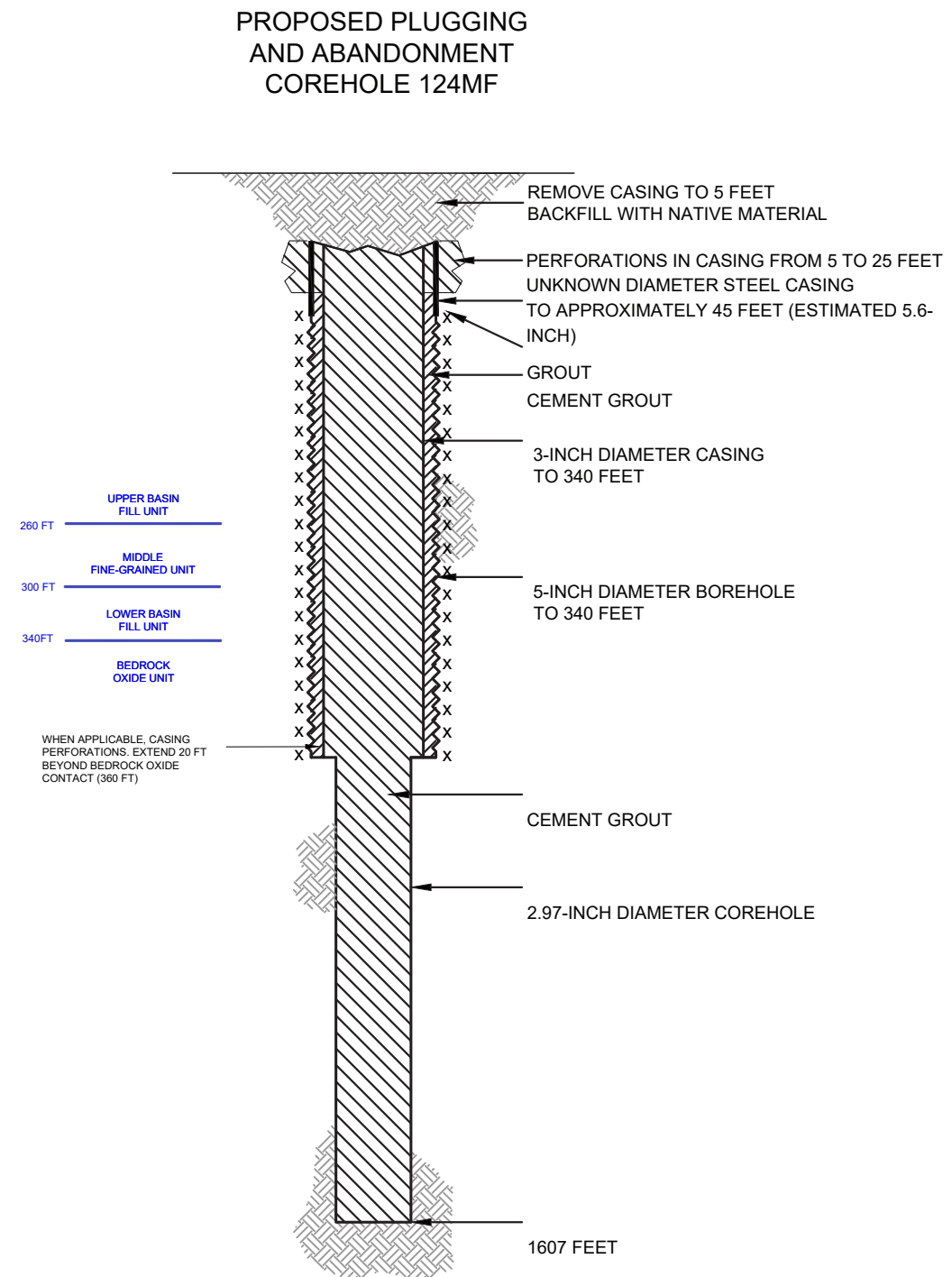
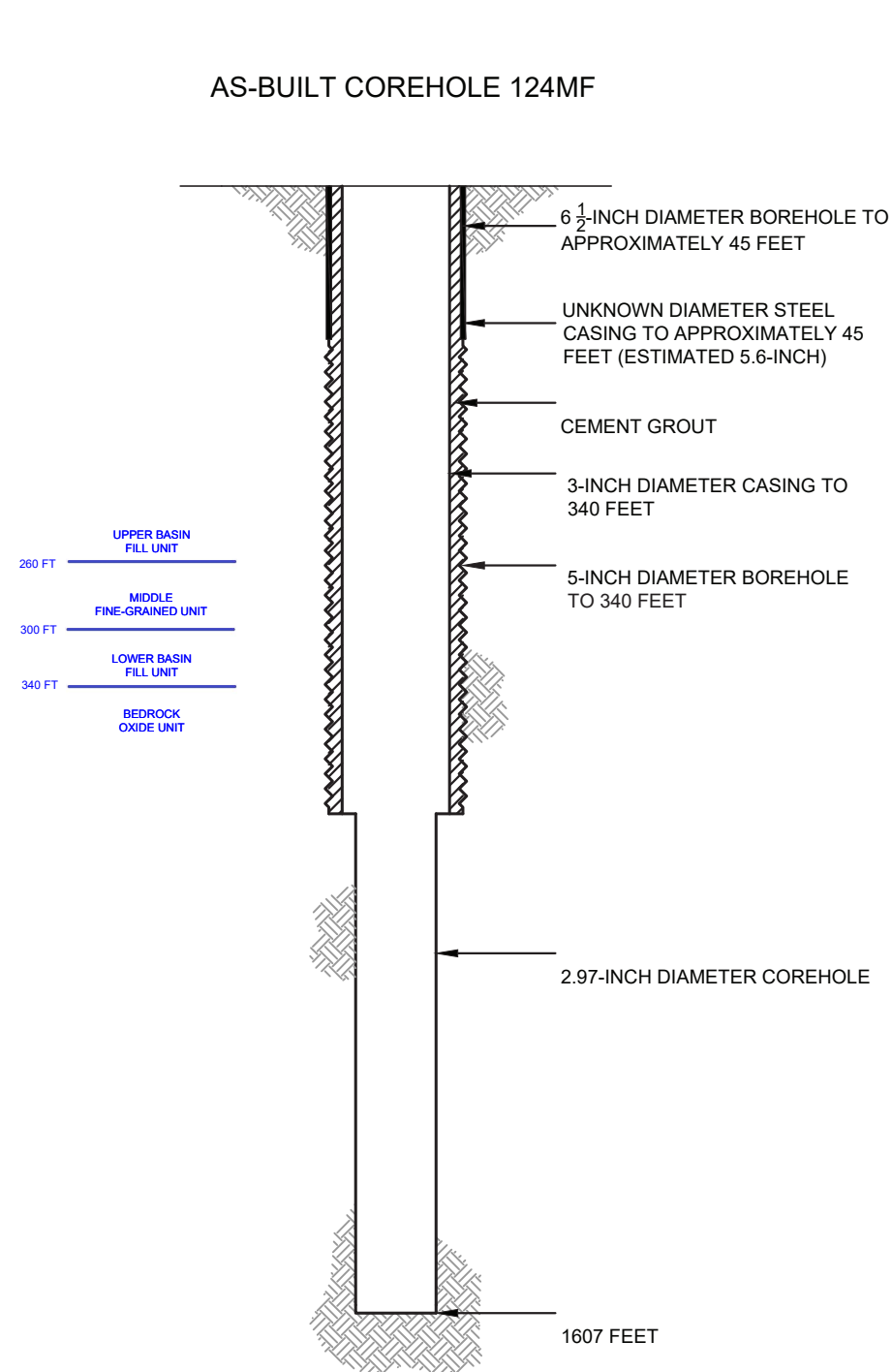
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Florence Copper Project
1575 W Hunt Hwy,
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Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

127MF

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04380593

Surface Location

NW 1/4 of NW 1/4 of Section 33 Township 4S Range 9E

Longitude -111.4346629

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

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Signature

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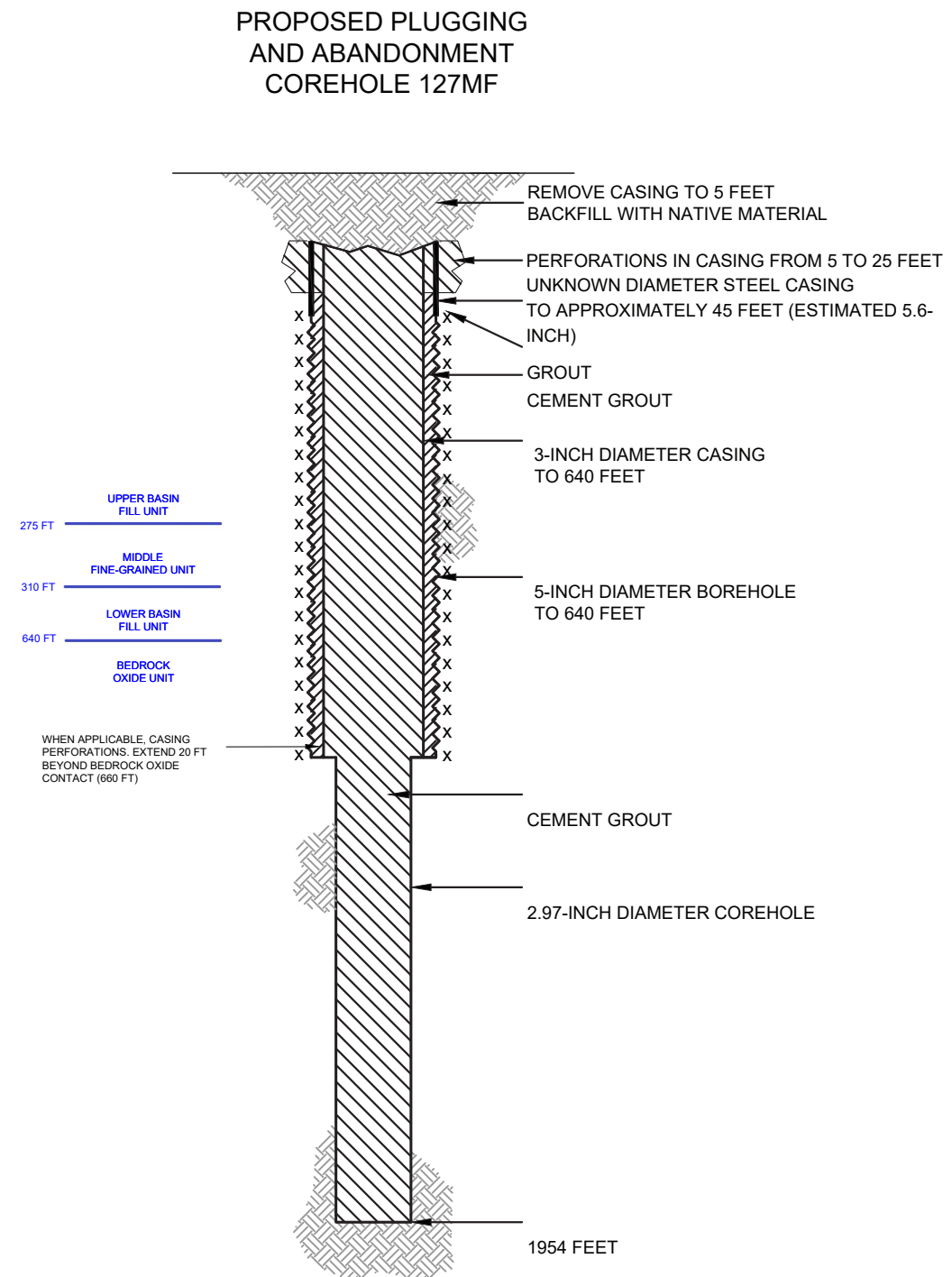
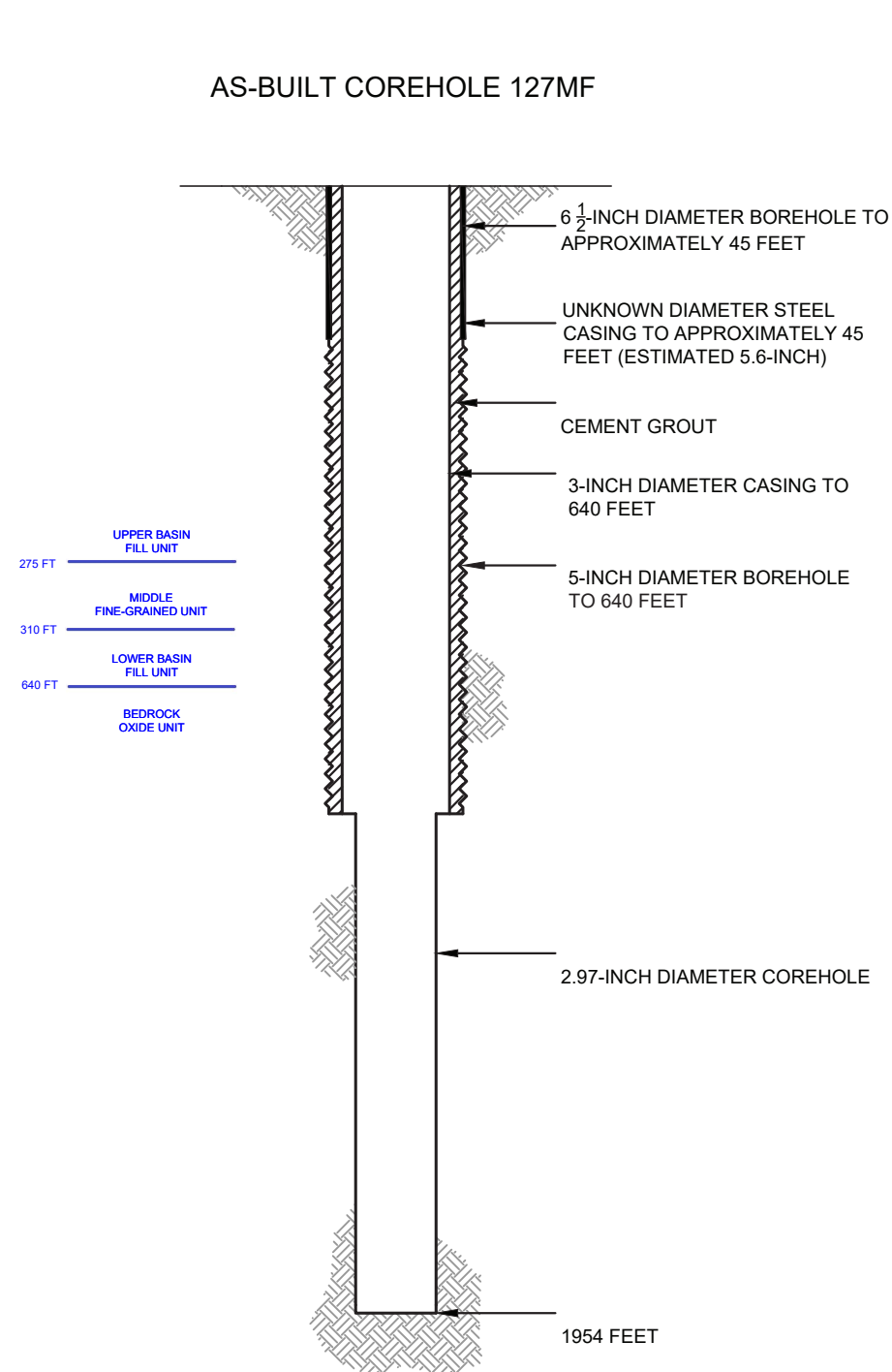
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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 127MF DIAGRAM



NOT TO SCALE
SEPTEMBER 2019

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

128MF

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05334643

Surface Location

SW 1/4 of NW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4346063

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021

- ☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open core hole from the bottom of the core hole to the top of the core hole. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated intervals, as necessary.

If the hole has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the core hole.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

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NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

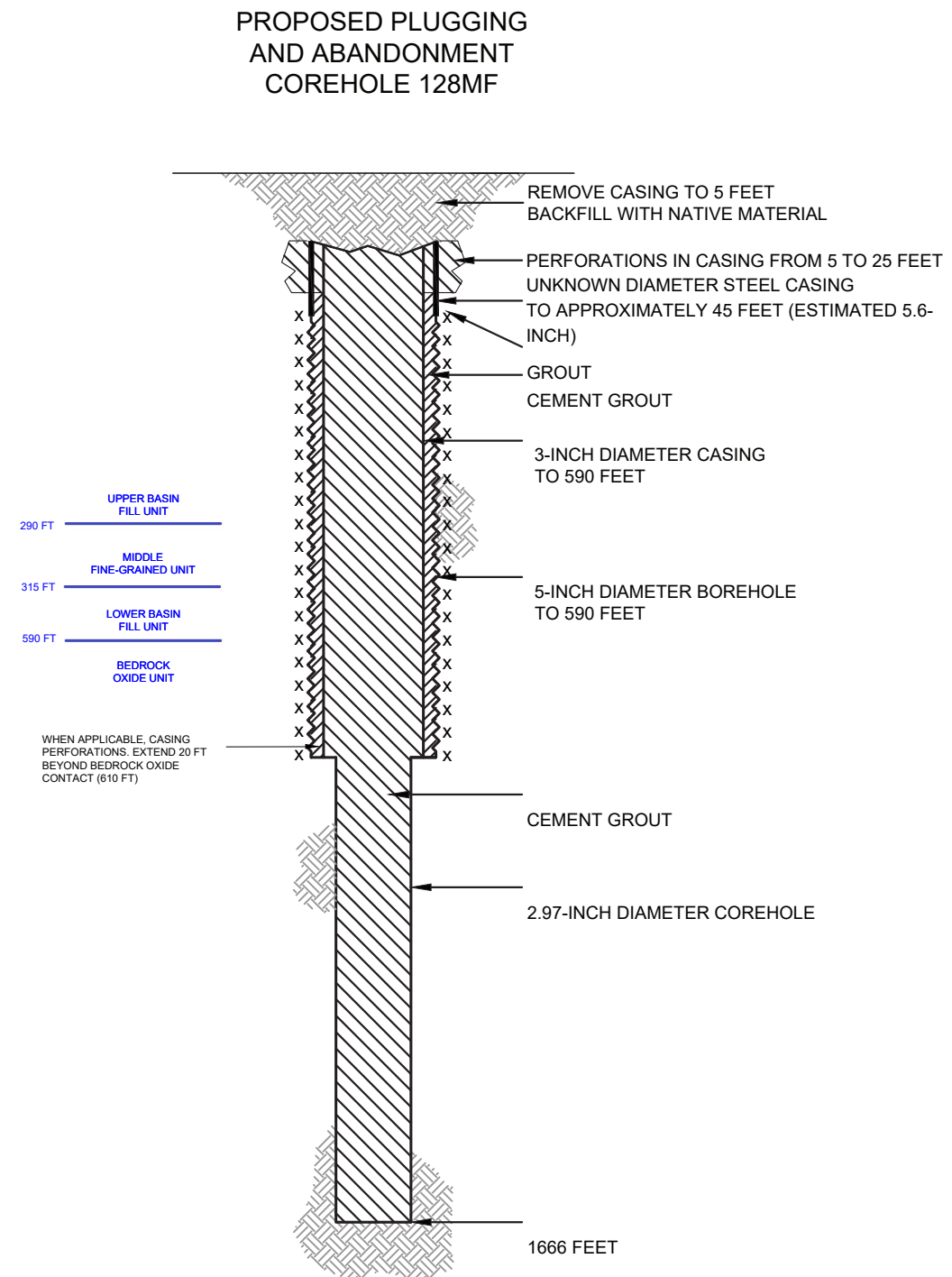
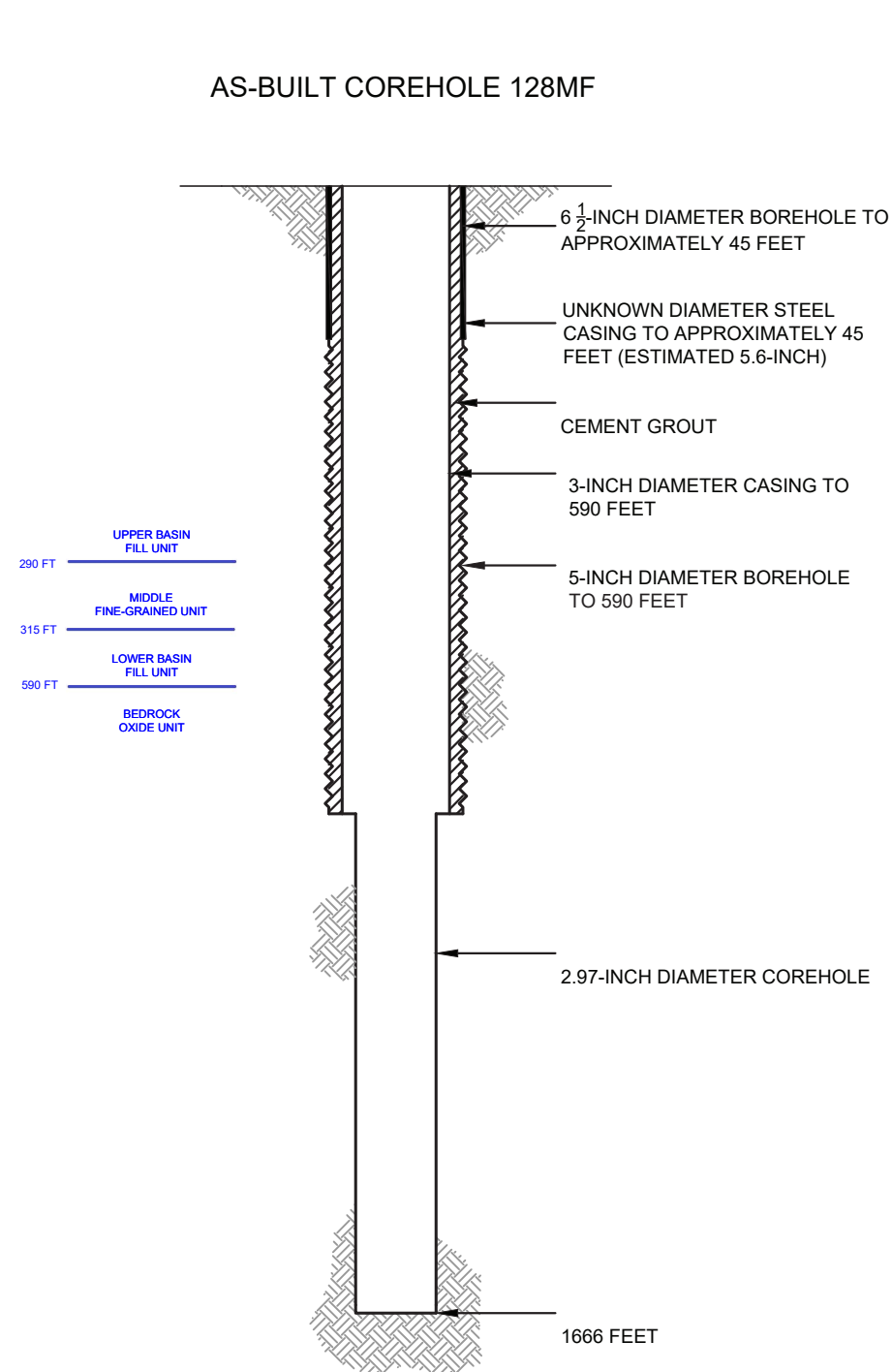
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For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

129S

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05092966

Surface Location

NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4312978

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

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I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

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Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

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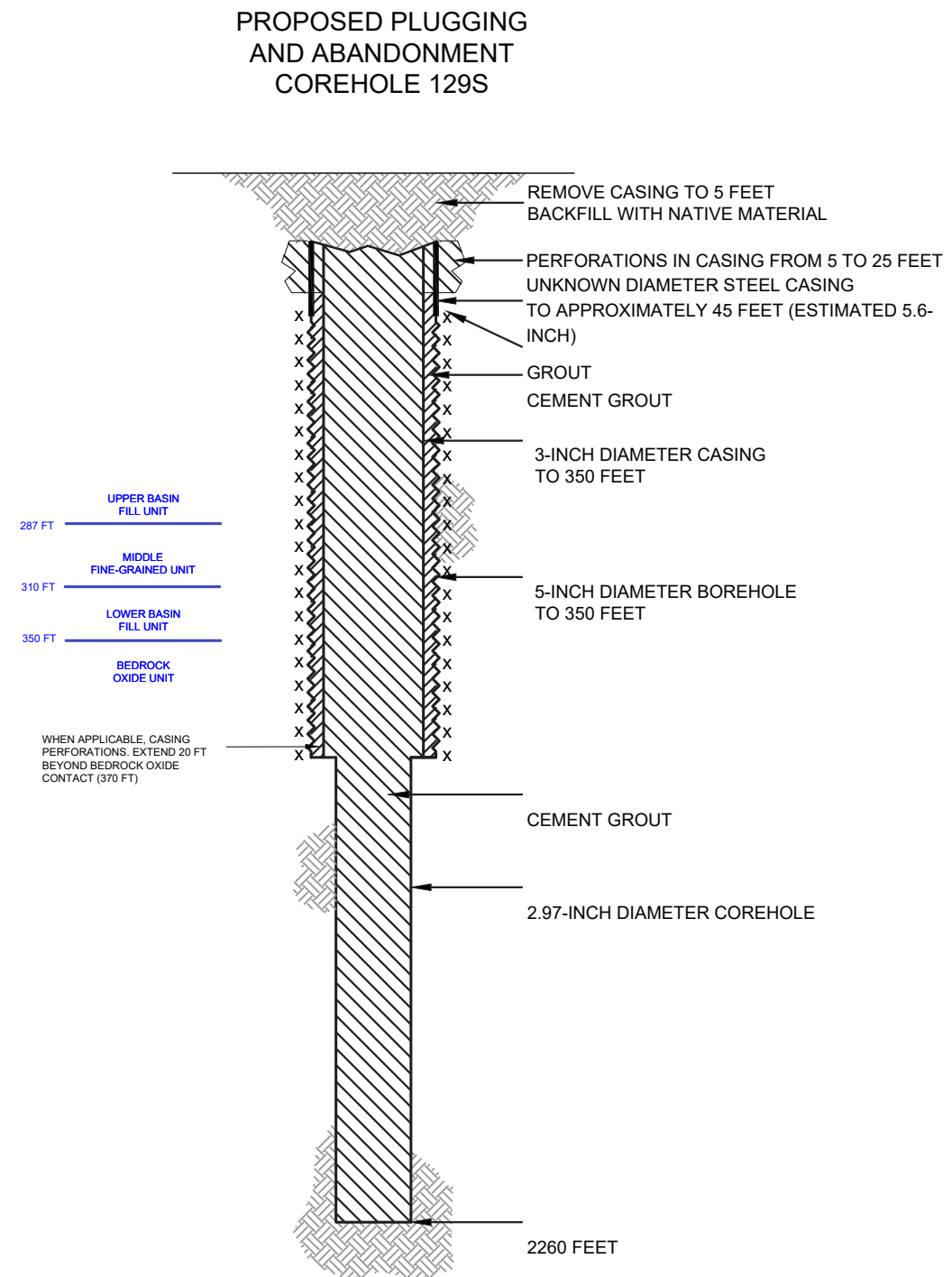
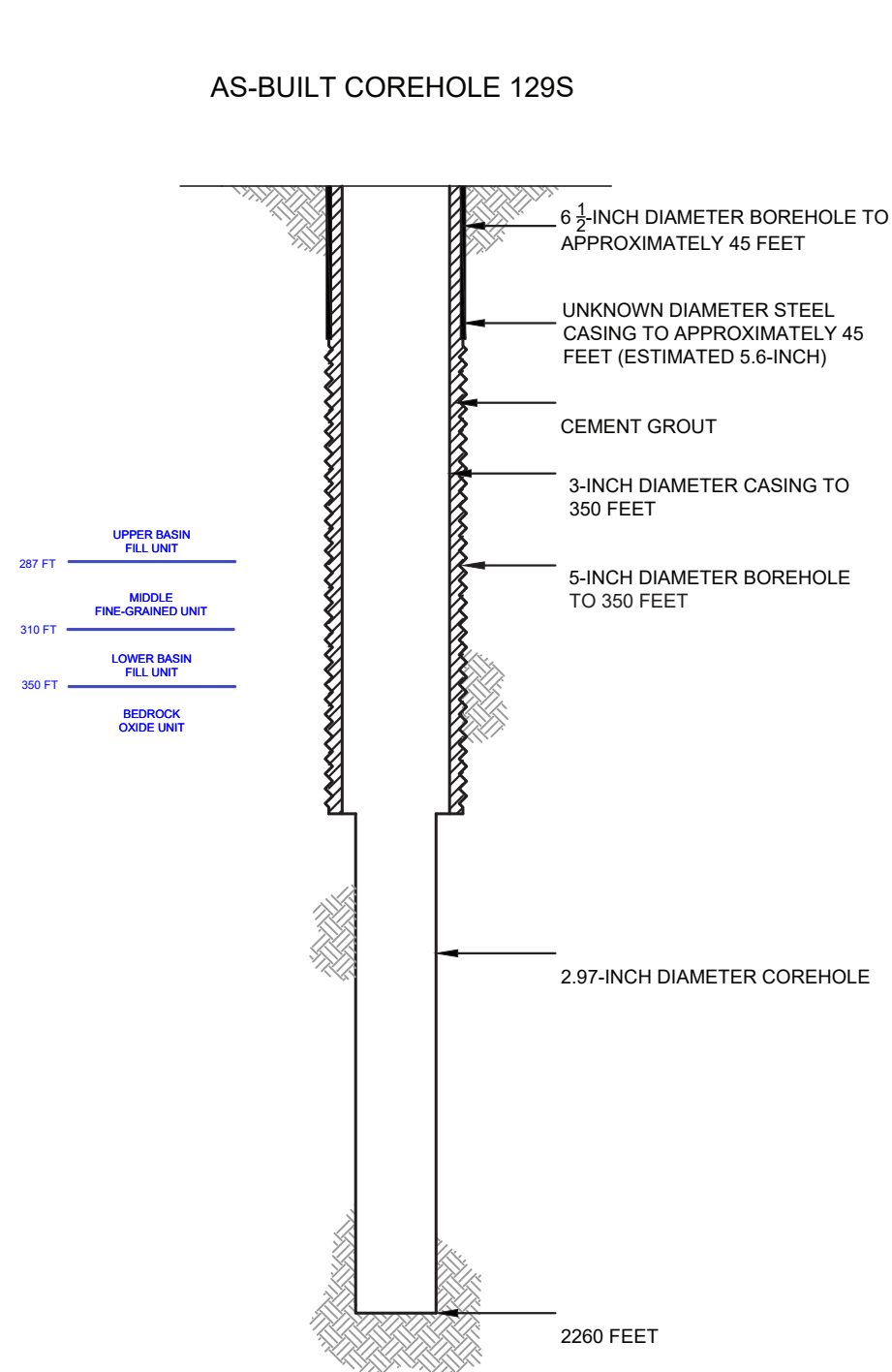
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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 129S DIAGRAM



NOT TO SCALE
SEPTEMBER 2019

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
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Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

131MF

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04852106

Surface Location

SE 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4232436

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021
☐ Report After Work
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Signature

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10/3/2019

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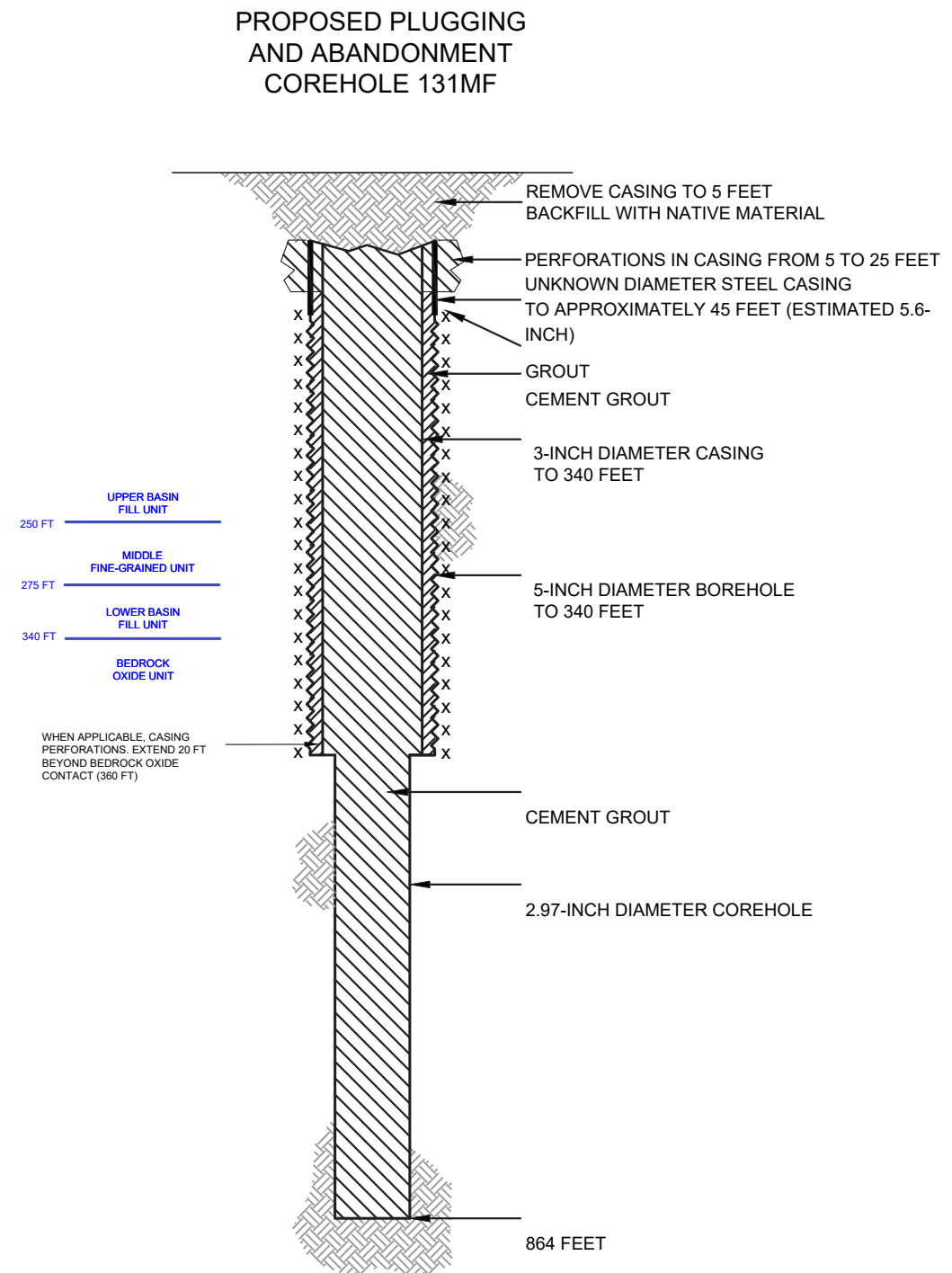
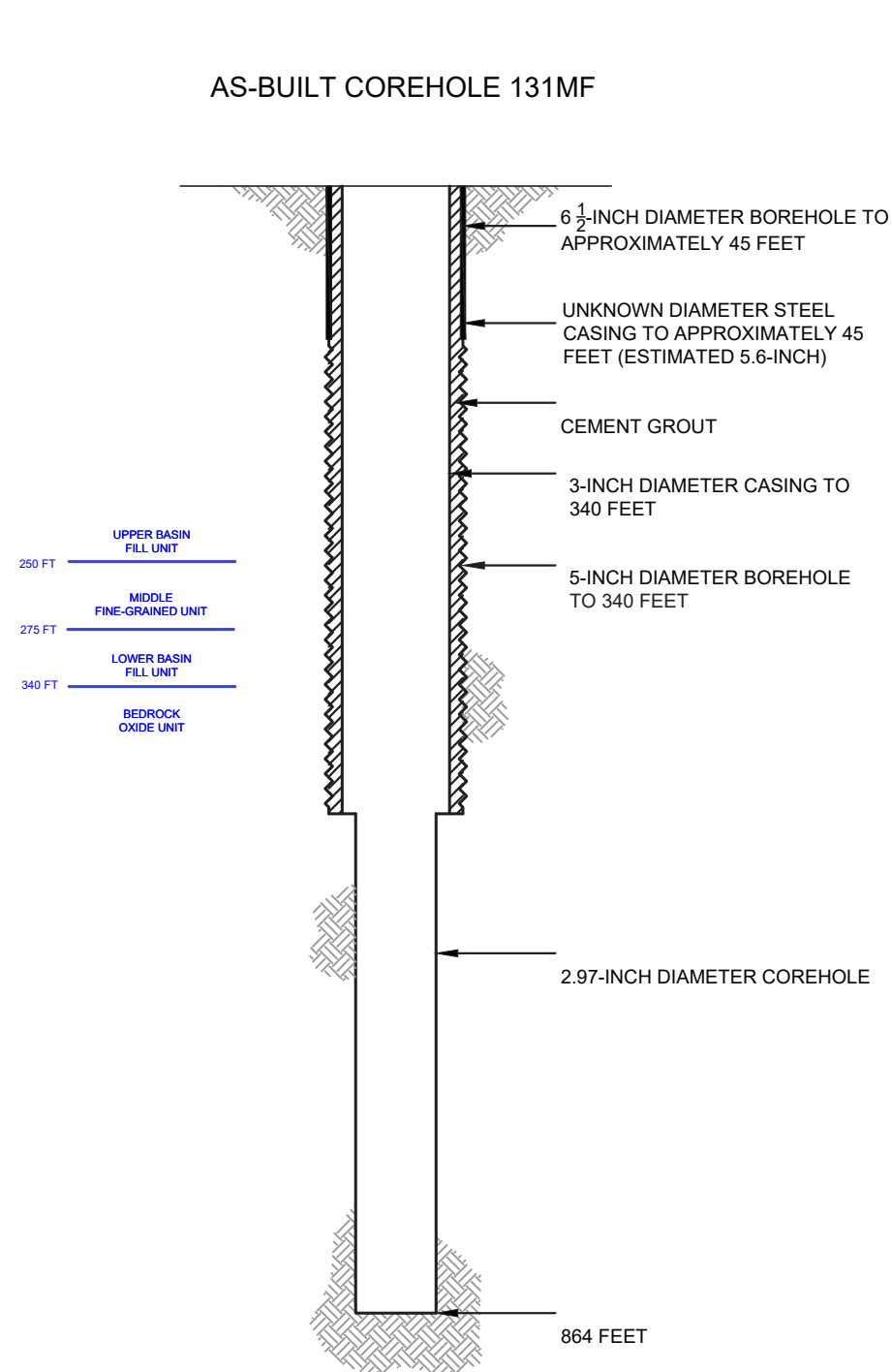
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For all of the above activities, include a well sketch depicting the work, results of well tests/logging performed, service company tickets, and any other available information demonstrating how the work was/is to be performed. Also, specify whether depths are below ground surface, relative to Kelly bushing, etc.

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FLORENCE COPPER, INC.
FLORENCE, ARIZONA

COREHOLE 131MF DIAGRAM



NOT TO SCALE
SEPTEMBER 2019

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

132MF

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.04736209

Surface Location

SW 1/4 of SE 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4289363

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

Timing of Action (pick one)

Type of Action (pick one)

- ☐ Class I
☐ Class II
☒ Class III
☐ Class V

- ☒ Notice Prior to Work
Date Expected to Commence March 2021
☐ Report After Work
Date Work Ended

- ☐ Well Rework
☒ Plugging and Abandonment
☐ Conversion to a Non-Injection Well

Provide a narrative description of the work planned to be performed, or that was performed. Use additional pages as necessary. See instructions.

A workover rig capable of performing the required abandonment operations at the required depths will be moved in and set up over the core hole. The core hole will be inspected to determine the depth to which the hole remains open and if any obstructions are present in the core hole; the presence and condition of any existing collar will also be documented. If necessary, the core hole will be cleaned out to a depth of at least 100 feet below the bedrock-LBFU contact to enable placement of cement seals.

If collar is present, an attempt will be made to remove it. If removal of the collar is not feasible, it will be left in the hole and perforated as needed to allow an annular seal to be placed to a depth of at least 25 feet bgs. In areas of agricultural use, the surface casing will be cut at least 5 feet bgs and removed.

If the collar cannot be removed, it will be perforated from at least 20 feet below the bedrock-LBFU contact to at least 20 feet above the contact; from at least 20 feet below the base of the MFGU to at least 20 feet above the top of the MFGU; and from at least 25 feet bgs to 5 feet bgs.

A tremie pipe will be used to place Type V cement in the open core hole from the bottom of the core hole to the top of the core hole. Cement retainers, as described above, will be used to force cement grout into the annulus and behind perforated intervals, as necessary.

If the hole has been obstructed, as much cement as possible will be placed from 100 feet below the LBFU-bedrock contact to the top of the core hole.

The volume of Type V cement will be recorded and will not be less than the estimated volume of material required to fill each interval. All cement grout will consist of Type V cement, or equivalent approved in accordance with the UIC Permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR § 144.32)

Name and Official Title (Please type or print)

Dan Johnson, VP - General Manager

Signature

Date Signed

10/3/2019

INSTRUCTIONS FOR FORM 7520-19

This form replaces forms 7520-12 and 7520-14. Use this form only when work is planned or has occurred that affects the well's construction or operation as an injection well, including work on the casing, tubing or packer (or for shallow Class V wells, the subsurface fluid emplacement network). Use one form per injection well. While reports or other information developed by contractors or service companies may be attached, this form must be signed by a responsible entity as described at 40 CFR 144.32. Note: operators closing Class V wells should use Form 7520-17.

NAME, ADDRESS, PHONE AND/OR EMAIL OF PERMITTEE: Enter the name and street address, city/town, state, and ZIP code of the permittee. Also provide an email address (if available) and/or a phone number.

PERMIT OR EPA ID NUMBER: Enter the well identification number or permit number assigned to the well by the EPA or the permitting authority.

API NUMBER: Enter the number assigned by the local jurisdiction (usually a State Oil and Gas Agency) using the American Petroleum Institute standard numbering system.

FULL WELL NAME: Enter the full name of the well or project.

Enter the **STATE** and **COUNTY** where the well is located. For States that do not have counties, use the name of that State's equivalent jurisdiction at a more local level.

WELL LOCATION: Fill in the complete township, range, and section to the nearest quarter-quarter section. A township is north or south of the baseline, and a range is east or west of the principal meridian (e.g., T12N, R34W). Also include the distance, in feet, from the nearest north or south line and nearest east or west line of the quarter-section. Also, enter the **latitude** and **longitude** of the well in decimal degrees, to five or six places if possible; be sure to include a negative sign for the longitude of a well in the Western Hemisphere and a negative sign for the latitude of a well in the Southern Hemisphere.

Enter the **WELL CLASS**, i.e., the class of injection well as defined in 40 CFR 144.6.

TIMING OF THE ACTION: Check **Notice prior to work** if the activity has not yet occurred (i.e., is planned). Check **Report after work** if the activity described has already occurred. As appropriate, include the date the activity is expected to start or the date the activity was completed. (Note this may not be available, e.g., for a plugging plan submitted with a permit application.)

TYPE OF ACTION: Check the appropriate box to describe the kind of activity being reported. Check **Well Rework** for work that was/will be performed on the well after it has already been in operation as an injection well. Check **Plugging and Abandonment** to report on plans for or descriptions of final closure/plugging after use as an injection well. Check **Conversion to a Non-Injection Well** if the well is to be converted to something other than an injection well.

Provide a **NARRATIVE DESCRIPTION** of the work planned to be performed, or that was performed. The narrative should include a description of the main procedures planned or that occurred during the work activity. A service company report, daily report, or similar document may be attached if it includes all the requested information and is clear and legible.

For well reworks, include the following information: The reason for the well rework; depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; method(s) to demonstrate that the well has mechanical integrity (as applicable); and any deviations from the approved rework plan (as applicable).

For a well plugging plan, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; and wait-on-cement times, if any. Also provide one or more cost estimates from an independent firm in the business of plugging and abandoning wells to plug the well as described in the plan.

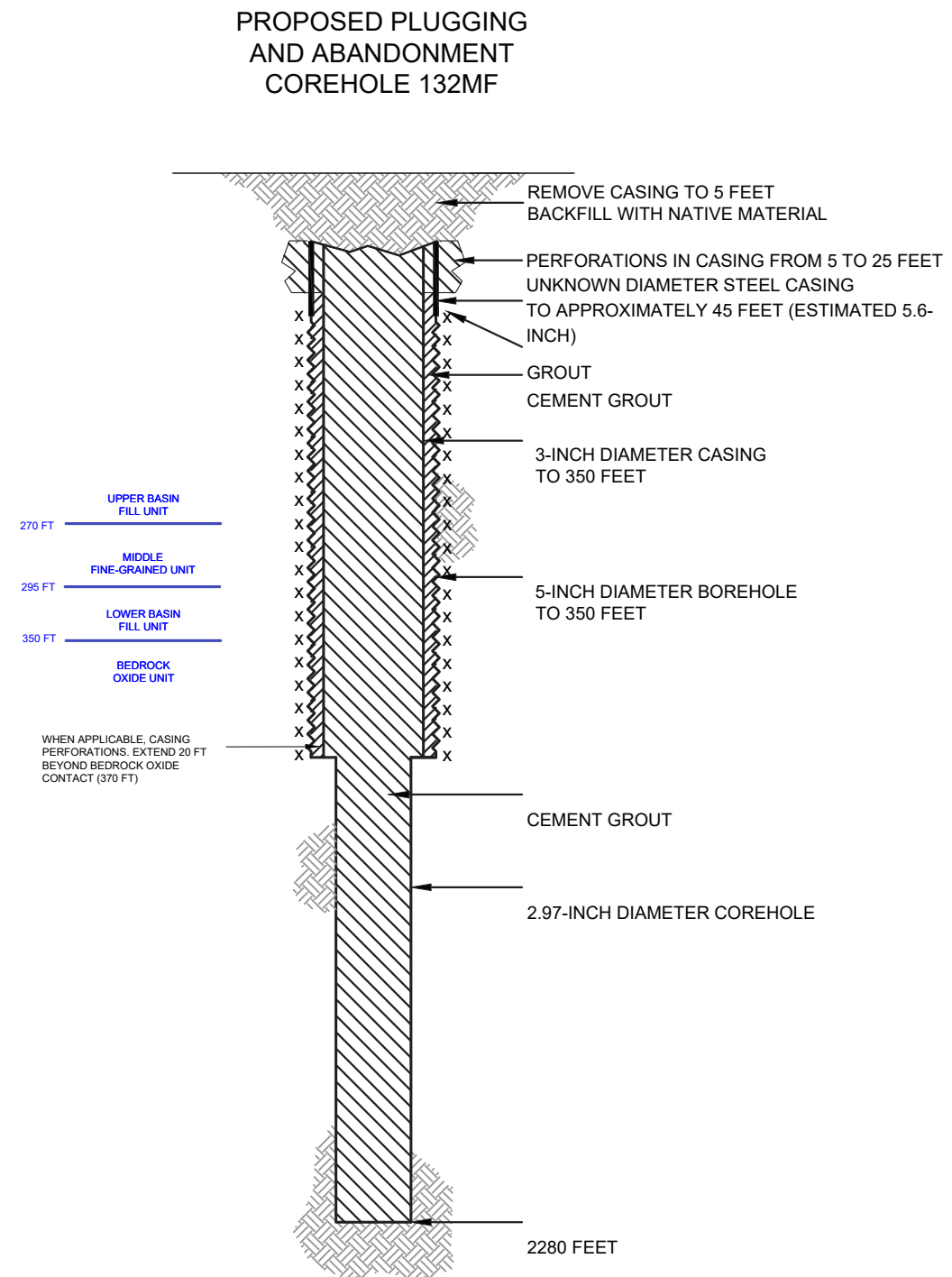
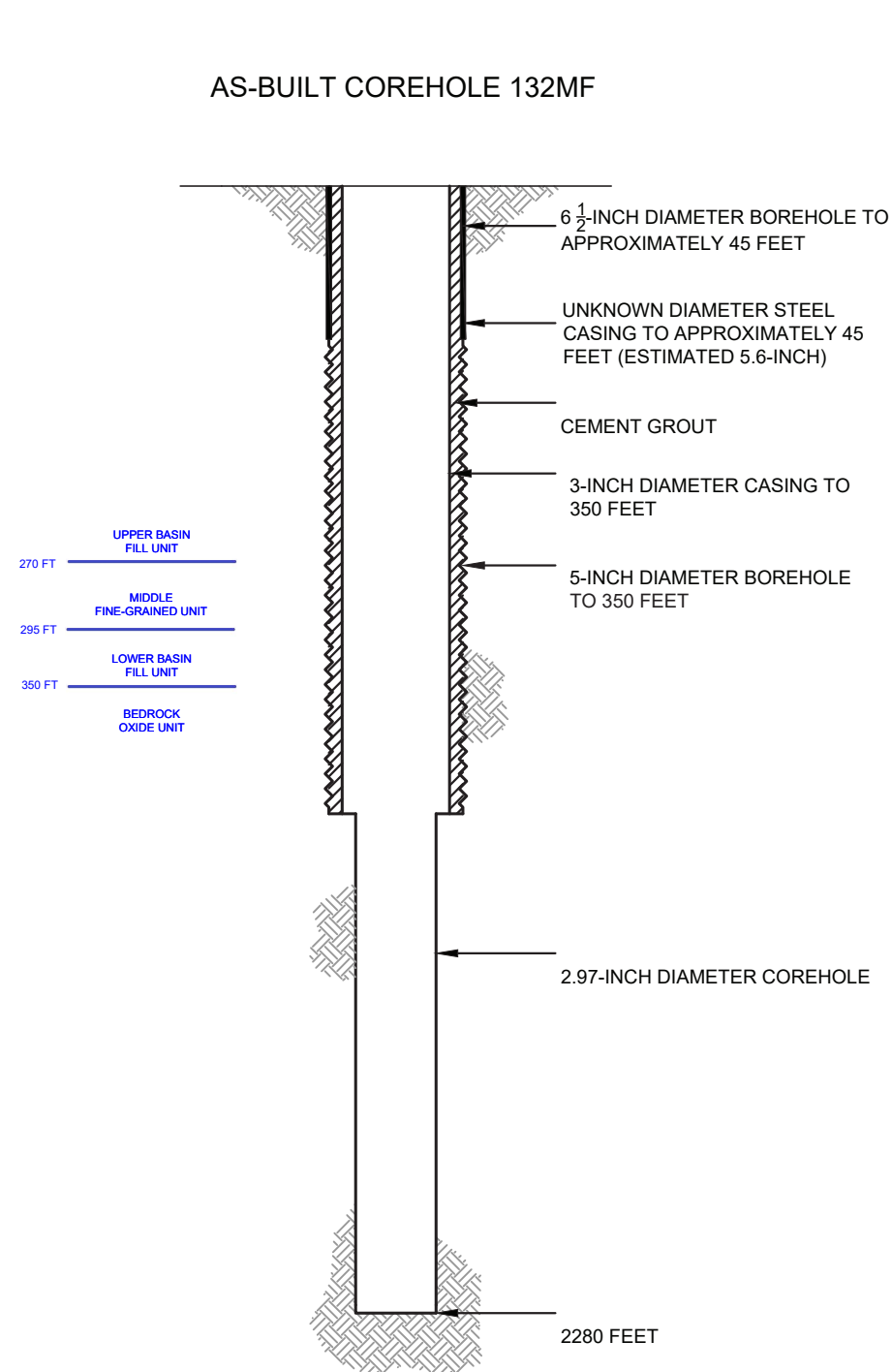
For well plugging affidavit, include the following information: Reason for the well plugging; number of plugs placed, and their depths; materials used as plugs (e.g., cast iron bridge plug, cement, cement retainer); method to set plugs; wait-on-cement times, if any; and any deviations from the approved plugging plan (if applicable).

For conversion to a non-injection well, include the following information: Depths of activity; type of activity; changes to injection well configuration, well casing, or cement behind casing; any plug added to the well and its depth; any newly drilled interval and its depth; depths of new perforations; and method(s) to demonstrate that the well has mechanical integrity (as applicable).

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FLORENCE, ARIZONA

COREHOLE 132MF DIAGRAM



NOT TO SCALE
SEPTEMBER 2019

United States Environmental Protection Agency



WELL REWORK RECORD, PLUGGING AND ABANDONMENT PLAN, OR PLUGGING AND ABANDONMENT AFFIDAVIT

Name and Address, Phone Number and/or Email of Permittee

Florence Copper Project
1575 W Hunt Hwy,
Florence, AZ 85132

Permit or EPA ID Number

R9UIC-AZ3-FY11-1

API Number

Full Well Name

136S

State

Arizona

County

Pinal

Locate well in two directions from nearest lines of quarter section and drilling unit

Latitude 33.05212428

Surface Location

NE 1/4 of SW 1/4 of Section 28 Township 4S Range 9E

Longitude -111.4321636

ft. from (N/S) Line of quarter section

ft. from (E/W) Line of quarter section.

Well Class

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Type of Action (pick one)

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☐ Class II
☒ Class III
☐ Class V

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